GW - 287

PERMITS, RENEWALS, & MODS Application

State of New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez Governor

John Bemis Cabinet Secretary

Brett F. Woods, Ph.D. Deputy Cabinet Secretary Jami Bailey
Division Director
Oil Conservation Division



AUGUST 28, 2012

Mr. Matt Webre Williams Four Corners, LLC 188 Country Road 4900 Bloomfield, NM 87413

Dear Mr. Webre:

Based on your responses given to the "Oil & Gas Facilities Questionnaire for Determination of a WQCC Discharge Permit" and a file review, the Oil Conservation Division (OCD) has determined that two of your facilities with an expired or soon to be expired permit do not require a Water Quality Control Commission (WQCC) Discharge Permit. This means that the WQCC Discharge Permit **GW - 287** (Snowshoe Straddle CS) and **GW - 129** (Crouch Mesa CS) are hereby rescinded and you are not required to proceed with the renewal of this expired or soon to expire WQCC Discharge Permit. OCD will close this permit in its database.

Because this WQCC Discharge Permit is no longer valid, you may be required to obtain a separate permit(s) for other processes at your facility, such as: pits, ponds, impoundments, below-grade tanks; waste treatment, storage and disposal operations; and landfarms and landfills. OCD will make an inspection of your facility to determine if any of these existing processes may require a separate permit under OCD's Oil, Gas, and Geothermal regulations. If OCD determines that a separate permit(s) is required, then a letter will be sent to you indicating what type of permit is required.

Please keep in mind, if your facility has any discharges that would require a WQCC Discharge Permit now or in the future, then you will be required to renew or obtain a WQCC Discharge Permit. If you have any questions regarding this matter, please contact Glenn von Gonten at 505-476-3488.

Thank you for your cooperation.

Jami Bailey
Director

JB/gvg

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ATTACHMENT TO THE DISCHARGE PERMIT WILLIAMS FOUR CORNERS, LLC, SNOWSHOE COMPRESSOR STATION (GW-287) DISCHARGE PERMIT APPROVAL CONDITIONS NOVEMBER 26, 2007

Please remit a check for \$400.00 made payable to Water Quality Management Fund:

Water Quality Management Fund C/o: Oil Conservation Division 1220 S. Saint Francis Drive Santa Fe, New Mexico 87505

- 1. Payment of Discharge Plan Fees: All discharge permits are subject to WQCC Regulations. Every billable facility that submits a discharge permit application will be assessed a filing fee of \$100.00, plus a renewal flat fee (see WQCC Regulation 20.6.2.3114 NMAC). The Oil Conservation Division ("OCD") has received the required \$100.00 filing fee. However, the owner/operator still owes the required \$400.00 renewal permit fee for gas compressor stations between 0 and 1000 horsepower.
- 2. Permit Expiration, Renewal Conditions and Penalties: Pursuant to WQCC Regulation 20.6.2.3109.H.4 NMAC, this permit is valid for a period of five years. The permit will expire on November 24, 2012 and an application for renewal should be submitted no later than 120 days before that expiration date. Pursuant to WQCC Regulation 20.6.2.3106.F NMAC, if a discharger submits a discharge permit renewal application at least 120 days before the discharge permit expires and is in compliance with the approved permit, then the existing discharge permit will not expire until the application for renewal has been approved or disapproved. Expired permits are a violation of the Water Quality Act {Chapter 74, Article 6, NMSA1978} and civil penalties may be assessed accordingly.
- 3. **Permit Terms and Conditions:** Pursuant to WQCC Regulation 20.6.2.3104 NMAC, when a permit has been issued, the owner/operator must ensure that all discharges shall be consistent with the terms and conditions of the permit. In addition, all facilities shall abide by the applicable rules and regulations administered by the OCD pursuant to the Oil and Gas Act, NMSA 1978, Sections 70-2-1 through 70-2-38.
- 4. Owner/Operator Commitments: The owner/operator shall abide by all commitments submitted in its July 24, 2007 discharge plan renewal application, including attachments and subsequent amendments and these conditions for approval. Permit applications that reference previously approved plans on file with the division shall be incorporated in this permit and the owner/operator shall abide by all previous commitments of such plans and these conditions for approval.

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- 5. Modifications: WQCC Regulation 20.6.2.3107.C, and 20.6.2.3109 NMAC addresses possible future modifications of a permit. The owner/operator (discharger) shall notify the OCD of any facility expansion, production increase or process modification that would result in any significant modification in the discharge of water contaminants. The Division Director may require a permit modification if any water quality standard specified at 20.6.2.3103 NMAC is being or will be exceeded, or if a toxic pollutant as defined in WQCC Regulation 20.6.2.7 NMAC is present in ground water at any place of withdrawal for present or reasonably foreseeable future use, or that the Water Quality Standards for Interstate and Intrastate streams as specified in 20.6.4 NMAC are being or may be violated in surface water in New Mexico.
- 6. Waste Disposal and Storage: The owner/operator shall dispose of all wastes at an OCD-approved facility. Only oil field RCRA-exempt wastes may be disposed of by injection in a Class II well. RCRA non-hazardous, non-exempt oil field wastes may be disposed of at an OCD-approved facility upon proper waste determination pursuant to 40 CFR Part 261. Any waste stream that is not listed in the discharge permit application must be approved by the OCD on a case-by-case basis.
- A. OCD Rule 712 Waste: Pursuant to OCD Rule 712 (19.15.9.712 NMAC) disposal of certain non-domestic waste without notification to the OCD is allowed at NMED permitted solid waste facilities if the waste stream has been identified in the discharge permit and existing process knowledge of the waste stream does not change.
- **B.** Waste Storage: The owner/operator shall store all waste in an impermeable bermed area, except waste generated during emergency response operations for up to 72 hours. All waste storage areas shall be identified in the discharge permit application. Any waste storage area not identified in the permit shall be approved on a case-by-case basis only. The owner/operator shall not store oil field waste on-site for more than 180 days unless approved by the OCD.
- 7. **Drum Storage:** The owner/operator must store all drums, including empty drums, containing materials other than fresh water on an impermeable pad with curbing. The owner/operator must store empty drums on their sides with the bungs in place and lined up on a horizontal plane. The owner/operator must store chemicals in other containers, such as tote tanks, sacks, or buckets on an impermeable pad with curbing.
- 8. Process, Maintenance and Yard Areas: The owner/operator shall either pave and curb or have some type of spill collection device incorporated into the design at all process, maintenance, and yard areas which show evidence that water contaminants from releases, leaks and spills have reached the ground surface.
- 9. Above Ground Tanks: The owner/operator shall ensure that all aboveground tanks have impermeable secondary containment (e.g., liners and berms), which will contain a volume of at least one-third greater than the total volume of the largest tank or all interconnected tanks. The owner/operator shall retrofit all existing tanks before discharge permit renewal. Tanks that contain fresh water or fluids that are gases at atmospheric temperature and pressure are exempt from this condition.

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Labeling: The owner/operator shall clearly label all tanks, drums, and containers to identify their 10. contents and other emergency notification information. The owner/operator may use a tank code numbering system, which is incorporated into their emergency response plans.

11. Below-Grade Tanks/Sumps and Pits/Ponds.

- All below-grade tanks and sumps must be approved by the OCD prior to installation and A. must incorporate secondary containment with leak detection into the design. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal. All existing below-grade tanks and sumps without secondary containment and leak detection must be tested annually or as specified herein. Systems that have secondary containment with leak detection shall have a monthly inspection of the leak detection system to determine if the primary containment is leaking. Small sumps or depressions in secondary containment systems used to facilitate fluid removal are exempt from these requirements if fluids are removed within 72 hours.
- All pits and ponds, including modifications and retrofits, shall be designed by a certified В. registered professional engineer and approved by the OCD prior to installation. In general, all pits or ponds shall have approved hydrologic and geologic reports, location, foundation, liners, and secondary containment with leak detection, monitoring and closure plans. All pits or ponds shall be designed, constructed and operated so as to contain liquids and solids in a manner that will protect fresh water, public health, safety and the environment for the foreseeable future. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal.
- The owner/operator shall ensure that all exposed pits, including lined pits and open top C. tanks (8 feet in diameter or larger) shall be fenced, screened, netted, or otherwise rendered nonhazardous to wildlife, including migratory birds.
- The owner/operator shall maintain the results of tests and inspections at the facility covered D. by this discharge permit and available for OCD inspection. The owner/operator shall report the discovery of any system which is found to be leaking or has lost integrity to the OCD within 15 days. The owner/operator may propose various methods for testing such as pressure testing to 3 pounds per square inch greater than normal operating pressure and/or visual inspection of cleaned tanks and/or sumps, or other OCD-approved methods. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

12. **Underground Process/Wastewater Lines:**

The owner/operator shall test all underground process/wastewater pipelines at least once every five (5) years to demonstrate their mechanical integrity, except lines containing fresh water or fluids that are gases at atmospheric temperature and pressure. Pressure rated pipe shall be tested by pressuring up to one and one-half times the normal operating pressure, if possible, or for atmospheric drain systems, to 3 pounds per square inch greater than normal operating pressure, and pressure held for a minimum of 30 minutes with no more than a 1% loss/gain in pressure. The owner/operator may use other methods for testing if approved by the OCD.

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- B. The owner/operator shall maintain underground process and wastewater pipeline schematic diagrams or plans showing all drains, vents, risers, valves, underground piping, pipe type, rating, size, and approximate location. All new underground piping must be approved by the OCD prior to installation. The owner/operator shall report any leaks or loss of integrity to the OCD within 15 days of discovery. The owner/operator shall maintain the results of all tests at the facility covered by this discharge permit and they shall be available for OCD inspection. The owner/operator shall notify the OCD at least 72 hours prior to all testing.
- 13. Class V Wells: The owner/operator shall close all Class V wells (e.g., septic systems, leach fields, dry wells, etc.) that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes unless it can be demonstrated that ground water will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD-regulated facilities that inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only, must be permitted by the New Mexico Environment Department (NMED).
- 14. Housekeeping: The owner/operator shall inspect all systems designed for spill collection/prevention and leak detection at least monthly to ensure proper operation and to prevent over topping or system failure. All spill collection and/or secondary containment devices shall be emptied of fluids within 72 hours of discovery. The owner/operator shall maintain all records at the facility and available for OCD inspection.
- 15. Spill Reporting: The owner/operator shall report all unauthorized discharges, spills, leaks and releases and conduct corrective action pursuant to WQCC Regulation 20.5.12.1203 NMAC and OCD Rule 116 (19.15.3.116 NMAC). The owner/operator shall notify both the OCD District Office and the Santa Fe Office within 24 hours and file a written report within 15 days.
- **16. OCD Inspections:** The OCD may place additional requirements on the facility and modify the permit conditions based on OCD inspections.
- 17. Storm Water: The owner/operator shall implement and maintain run-on and runoff plans and controls. The owner/operator shall not discharge any water contaminant that exceeds the WQCC standards specified in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) including any oil sheen in any stormwater run-off. The owner/operator shall notify the OCD within 24 hours of discovery of any releases and shall take immediate corrective action(s) to stop the discharge.
- 18. Unauthorized Discharges: The owner/operator shall not allow or cause water pollution, discharge or release of any water contaminant that exceeds the WQCC standards listed in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) unless specifically listed in the permit application and approved herein. An unauthorized discharge is a violation of this permit.

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- 19. Vadose Zone and Water Pollution: The owner/operator shall address any contamination through the discharge permit process or pursuant to WQCC 20.6.2.4000-.4116 NMAC (Prevention and Abatement of Water Pollution). The OCD may require the owner/operator to modify its permit for investigation, remediation, abatement, and monitoring requirements for any vadose zone or water pollution. Failure to perform any required investigation, remediation, abatement and submit subsequent reports will be a violation of the permit.
- 20. Additional Site Specific Conditions: N/A
- 21. Transfer of Discharge Permit (WQCC 20.6.2.3111) Prior to any transfer of ownership, control, or possession (whether by lease, conveyance or otherwise) of a facility with a discharge permit, the transfer or shall notify the transferee in writing of the existence of the discharge permit, and shall deliver or send by certified mail to the department a copy of such written notification, together with a certification or other proof that such notification has in fact been received by the transferee.

 Upon receipt of such notification, the transferee shall have the duty to inquire into all of the provisions and requirements contained in such discharge permit, and the transferee shall be charged with notice of all such provisions and requirements as they appear of record in the department's file or files concerning such discharge permit. The transferee (new owner/operator) shall sign and return an original copy of these permit conditions and provide a written commitment to comply with the terms and conditions of the previously approved discharge permit.
- 22. Closure Plan and Financial Assurance: Pursuant to 20.6.2.3107 NMAC an owner/operator shall notify the OCD when any operations of the facility are to be discontinued for a period in excess of six months. Prior to closure, or as a condition of this permit, or request from the OCD, the operator will submit an approved closure plan, modified plan, and/or provide adequate financial assurance.
- 23. Certification: Williams Four Corners, LLC, (Owner/Operator), by the officer whose signature appears below, accepts this permit and agrees to comply with all submitted commitments, including these terms and conditions contained here. Owner/Operator further acknowledges that the OCD may, for good cause shown, as necessary to protect fresh water, public health, safety, and the environment, change the conditions and requirements of this permit administratively.

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Conditions accepted by: "I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment."

Williams Four C	orners, LLC
Company Name-	print name above
David Bay	/S
Company Repres	entative- print name
David	Rey- entative- signature
Company Repres	entative- signature
Title Sr. Enviro	onmental Specialist
Date: Decem	aber 12, 2007

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No.	dated 12/14/07
or cash received onin the amount of	\$ 400
from Williams Four Co.	SHE1.5
for 6w-287	
Submitted by: LAWIGHE Former	. / /
Submitted to ASD by: Your har Cane	
Received in ASD by:	
Filing Fee New Facility	Renewal
Modification Other	
Organization Code521.07 App	licable FY2004
To be deposited in the Water Quality Managemer	nt Fund.
Full Payment or Annual Incremen	nt



Environmental Department 188 County Road 4900 Bloomfield, NM 87413 (505) 634-4951 Fax (505) 632-4781

July 24, 2007

Mr. Wayne Price New Mexico Oil Conservation Division 1220 S. St. Francis Drive Santa Fe, NM

Dear Mr. Price:

Please find attached the application for renewal of the Williams Four Corners, LLC Snowshoe Compressor Station Discharge Permit, Number GW-287. This facility has had no modifications since the previous renewal in 2002. If you need any additional information, please call me at (505) 634-4951.

Sincerely yours,

David Bays, REM

Sr. Environmental Specialist

cc:

NMOCD - Aztec Office

Snowshoe File 220

District 1
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico Energy Minerals and Natural Resources

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505 Submit Original Plus I Copy to Santa Fe I Copy to Appropriate District Office

Revised June 10, 2003

DISCHARGE PLAN APPLICATION FOR SERVICE COMPANIES, GAS PLANTS, REFINERIES, COMPRESSOR, GEOTHERMAL FACILITIES AND CRUDE OIL PUMP STATIONS

(Refer to OCD Guidelines for assistance in completing the application)

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		□ New		× I	Renewal		Modificat	ion	
1.	Type:	Natural Gas (Compress	sor Station	(Snowshoe St	ation, GW-2	87)		
2.	Operator:	Williams Fou	ır Corner	s, LLC					
	Address:	188 Road 490	00 Bloor	nfield, NM	87413				
	Contact Person:	David Bays				Phone:	(505) 634	4-4951	
3.	Location:	SW/4	NW/4	Section	15	Township	29N	Range	10W
4.	Attach the name,	telephone numb	ber and a	ddress of tl	ne landowner	of the facility	y site.		
5.	Attach the descrip facility.	otion of the faci	lity with	a diagram	indicating loca	ation of fenc	es, pits, dil	kes and tanks	on the
6.	Attach a descripti	on of all materi	als store	d or used a	t the facility.				
7.	Attach a descripti waste water must	•	ources of	effluent ar	nd waste solids	s. Average d	aily qualit	y and daily vo	olume of
8.	Attach a descripti	on of current lie	quid was	te and solid	l waste collect	tion/treatmer	ıt/disposal	systems.	
9.	Attach a descripti	on of proposed	modifica	ations to ex	isting collection	on/treatment	/disposal s	ystems.	
10.	Attach a routine i	nspection and n	naintenar	nce plan to	ensure permit	compliance			
11.	Attach a continge	ncy plan for rep	porting a	nd clean-up	of spills or re	eleases.			
12.	 Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included. 								
13.	3. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other rules, regulations, and/or orders.								
14.	CERTIFICATION best of my knowle			e informat	ion submitted	with this app	olication is	true and corre	ect to the
NAM	fE: <u>Da</u>	vid Bays			Title:	Environme	ental Specia	alist	
Signa	ature:	Davil	Bay	<u></u>	Date:	July 24, 20	007		
E-Ma	ail Address: _dav	rid.bays@willia	ms.com	·					

DISCHARGE PLAN RENEWAL

SNOWSHOE COMPRESSOR STATION (GW-287)

Williams Four Corners, LLC
July 2007

I. TYPE OF OPERATION

The Snowshoe Compressor Station was constructed in 1997 to provide metering, compression, and dehydration services to various producers for the gathering of natural gas for treatment and delivery through Williams Four Corners, LLC. (WFC) Kutz Plant.

II. LEGALLY RESPONSIBLE PARTY

Williams Four Corners, LLC 188 CR 4900 Bloomfield, NM 87413 (505) 634-4951

Contact Person:

David Bays, Senior Environmental Specialist Phone and Address, Same as Above

III. LOCATION OF FACILITY

The Snowshoe Compressor Station is located in Section 15, Township 29 North, Range 10 West, in San Juan County, New Mexico, approximately 6 miles east of Bloomfield, New Mexico. A Site Location map is attached (USGS 7.5 Min. Quadrangles: Bloomfield and Blanco, New Mexico) as Figure 1. The facility layout is illustrated in Figure 2. All figures are attached following Section XI of the text.

IV. LANDOWNER

Williams Four Corners, LLC is leasing the subject property from:

Bureau of Land Management 1235 N. La Plata Highway Farmington, NM 87401 (505) 599-8900

V. FACILITY DESCRIPTION

This facility is classified as a field compressor station and is unmanned. The air quality permit for this site has allowed the operation of one 637-hp engine. In addition, there are various storage tanks, support structures and ancillary equipment. Records related to facility operations are maintained at central office locations.

VI. SOURCE, QUANTITY, AND QUALITY OF EFFLUENTS AND WASTE SOLIDS

The source, quantity, and quality of effluent and waste solids generated at the compressor station are summarized in Table 1.

TABLE 1 SOURCE, QUANTITY, AND QUALITY OF EFFLUENT AND WASTE SOLIDS SNOWSHOE COMPRESSOR STATION

PROCESS FLUID/WASTE	SOURCE	QUANTITY (Ranges)	QUALITY
Used Oil	Compressor	1000-2000 gal/year/engine.	Used motor oil w/no additives
Used Oil Filters	Compressor	50-100 filters/year/engine	No additives
Wash-down Water	Compressor Skid	500-1500 gal/year/engine	Biodegradable Soap and tap water w/traces of used oil
Natural Gas Condensate	Scrubber	1000-3000 bbl/year	No additives
Produced Water	Drawn of Natural Gas Condensate Tank, Gas Inlet Separator	200-500 bbl/year	No additives
Used Process Filters	Air, Inlet and Fuel Gas, Used Oil	75- 100/year	No additives
Empty Drums / Containers	Liquid Containers	10-40/year	No additives
Spill Residue (i.e., gravel, soil)	Incidental spills	Incident dependent	Incident dependent
Used Absorbents	Incidental spill/leak equipment wipe-down	Incident dependent	No additives

VII. TRANSFER, STORAGE, AND DISPOSAL OF PROCESS FLUIDS, EFFLUENTS AND WASTE SOLIDS

Wastes generated at this facility fall into two categories: exempt and non-exempt. Exempt wastes include, but may not be limited to, used process filters, condensate spill cleanups (spill residue), certain absorbents, and produced water with or without de minimus quantities of non-hazardous liquids. Non-exempt wastes include, but may not be limited to, used oil, used oil filters, and engine coolant. Table 2 describes the transfer, storage and disposal of exempt and non-exempt process fluids, effluents, and waste solids expected to be generated at the site.

Non-exempt waste management will be conducted in accordance with NMOCD requirements including the preparation of a Certificate of Waste Status for each non-exempt waste stream. Non-exempt wastes will be analyzed at a minimum for BTEX, TPH, RCRA D-List metals, ignitability, corrosivity, and reactivity to initially determine if such waste are hazardous as defined in 40 CFR Part 261. All wastes at the facility will be periodically surveyed for naturally occurring radioactive material (NORM) to determine if the concentrations of radium 226 exceed 30 picocuries per gram or if radiation exposure exceeds 50 microroentgens per hour. If affirmed, such materials will be handled and disposed in accordance with NMOCD NORM Regulations.

Barring facility modification and/or process changes, the classification of non-exempt wastes by laboratory analyses will be made once during the approval period of this plan. Subsequent laboratory analyses will be performed at the generator's discretion (minimum of once every five years), or more frequently to comply with waste acceptance procedures of the disposal facility.

TABLE 2
TRANSFER, STORAGE, AND DISPOSAL OF PROCESS FLUIDS, EFFLUENTS, AND WASTE SOLIDS
SNOWSHOE COMPRESSOR STATION

PROCESS FLUID/WASTE	STORAGE	CONTAINER CAPACITY (approximate)	CONTAINMENT/ SPILL PREVENTION	RCRA STATUS	DESCRIPTION OF FINAL DISPOSITION
Used Oil	Drum or other container	Varies	Transported to a WFS or contractor facility in drum or other container	Non-exempt	May be hauled to a WFS or contactor consolidation point before transport to EPA-registered used oil marketer for recycling.
Used Oil Filters	Drum or other container	Varies	Transported to a WFS or contractor facility in drum or other container	Non-exempt	Transported to a WFS or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.
Natural Gas Condensate	Above Ground Storage Tank	210 ьы	Berm	Exempt	Saleable liquids may be sold to refinery or liquid may be disposed at NMOCD- approved facility.
Produced Water	Below-grade vaulted tank	45 bbl (2) 70 bbl	Berm	Non-Exempt	Water may be transported to NMOCD-approved facility; or evaporation at WFS facility may be considered in future.
Wash-down Water	Below-grade dual-walled tank	750 gallons	Berm	Non-Exempt	Water may be transported to NMOCD-approved facility; or evaporation at WFS facility may be considered in future.
Used Process Filters	Drum or other container	Varies	Transported to a WFS or contractor facility in drum or other container	Exempt	Transported to a WFS or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.
Empty Drums / Containers	N/A	N/A	Berm	Non -exempt	Barrels are returned to supplier or transported to a WFS or contractor consolidation point and ultimately recycled/disposed consistent with applicable regulations.
Spill Residue (i.e., soil, gravel)	N/A	N/A	In situ treatment, land- farm, or alternate method	Incident dependent	Per Section VI, Remediation, in 8/13/93 NMOCD Guidelines for Remediation of Leaks, Spills, and Releases.
Used Absorbents	Drum or other container	Varies	Transported to a WFS or contractor facility in drum or other container	Non-exempt	Transported to a WFS or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.
Ambitrol	Above ground storage tank	500 gallons	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Compressor Oil	Above ground storage tank	(2) 500 gallons	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.

VIII. STORM WATER PLAN

This storm water section was developed to provide a plan to monitor and mitigate impact to storm water runoff from the facility. It serves to satisfy storm water management concerns of the NMOCD. It is not intended to comply with 40 CFR Part 122, Storm Water Discharges as this facility is excluded in 122.26 (c) (1) (iii).

This section concentrates on the identification of potential pollutants, inspection and maintenance of the pollutant controls, and gives a description of structural controls to prevent storm water pollution.

Site Assessment and Facility Controls

An evaluation of the material used and stored on this site that may be exposed to storm water indicates that no materials would routinely be exposed to precipitation. There are no engineered storm water controls or conveyances; all storm water leaves the site by overland flow.

Any leakage or spill from the identified potential pollutant sources, if uncontained by existing berms, curbs, or emergency response actions, could flow overland to open off-site drainage ditches (arroyos) and thus impact storm water. In such an event, containment would occur by blocking the ditch or culvert downstream of the pollutant. Cleanup of the substance and implementation of mitigation measures could be conducted while protecting downstream storm watercourses.

Best Management Practices

Following are Best Management Practices (BMPs) to be implemented to prevent or mitigate pollution to storm water from facility operations:

- All waste materials and debris will be properly disposed of on an on-going basis in appropriate containers and locations for collection and removal from the site.
- Temporary storage of potential pollutant sources will be located in areas with appropriate controls
 for storm water protection. This would include ensuring all containers are sealed/covered and
 otherwise protected from contact with precipitation.
- Periodic inspection of channels and culverts shall be performed at least twice annually and after any major precipitation event.
- Sediment deposits and debris will be removed from the channels and culverts as necessary and any erosion damage at the outfall (if any) will be repaired or controlled.
- Conduct inspections of the facility on a regular basis as part of the preventive maintenance site
 check. Such inspections will include the visual assessment of corroded or damaged drums and
 tanks, broken or breached containment structures, collapsed or clogged drainages or drain lines.

Implementation of the BMPs will prevent or mitigate impact to storm water runoff from this facility.

IX. INSPECTION, MAINTENANCE AND REPORTING

WFS's personnel will operate and maintain the compression unit at the facility. The facility will be remotely monitored for equipment malfunctions through Gas Dispatch. The facility will be visited several times per week at a minimum, and an operator will be on call 24 hours per day, 7 days per week, 52 weeks per year. The above ground and below-grade tanks will be gauged regularly, and monitored for leak detection.

In the event of a release of a reportable quantity, the operator reports the release to a WFS spill notification service. The service immediately notifies the WFS Environmental Department and all appropriate agencies.

X. SPILL/LEAK PREVENTION AND REPORTING (CONTINGENCY PLANS)

Spill containment berms around above ground storage tanks will be designed to contain 1-1/3 times the volume of the tank. The below-grade tanks will be constructed with a means of leak detection, and will either be double-walled tanks, double-bottomed tanks or a tank set on an impermeable pad.

WFS corporate policy and procedure for the controlling and reporting of Discharges or Spills of Oil or Hazardous Substances is provided in Appendix A. Significant spills and leaks are reported to the NMOCD pursuant to NMOCD Rule 116 and WQCC 1-203 using the NMOCD form (see Appendix B).

XI. SITE CHARACTERISTICS

The Snowshoe Compressor Station is located approximately 6 miles east of Bloomfield, New Mexico. The site elevation is approximately 5650 feet above mean sea level. The natural ground surface topography slopes downward toward the south. The maximum relief over the site is approximately 10 feet. Intermittent flow from the site will follow the unnamed drainage towards the south. The drainage flows to approximately 2 miles south-southwest to the San Juan River. The San Juan River, at approximately 5,480 feet in elevation, is the nearest down-gradient perennial source of surface water to the site.

A review of the available hydrologic data^{1,2,3} for this area revealed that there are no water wells within a 1/4-mile radius of Snowshoe Compressor Station. The water-bearing unit in the area is the Nacimiento Formation. This formation consists of a sequence of interbedded sandstone and mudstone. The estimated ground water depth at the site is 50 to 200 feet. The total dissolved solids concentration of area ground water is expected to range from 200 to 2,000 parts per million.

The 100-year 24-hour precipitation event at a regional weather station is 2.8 inches. This small amount of rainfall for the area should pose no flood hazards. Vegetation in the area consists predominantly of sagebrush and native grasses

Flood Protection: Surface water runoff from the area surrounding the site will be diverted around the facility into the natural drainage path.

References

¹Stone, W.J., Lyford, F.P., Frenzel, P.F., Mizell, N.H., Padgett, E.T., 1983, Hydrology and Water Resources of San Juan Basin, New Mexico Bureau of Mines and Mineral Resources, Hydrologic Report 6.

²Online Well Reports and Downloads, New Mexico Office of the State Engineer, 2000.

XII. FACILITY CLOSURE PLAN

All reasonable and necessary measures will be taken to prevent the exceedence of WCQQ Section 3103 water quality standards should WFS choose to permanently close the facility. WFS will submit a detailed closure plan to the NMOCD prior to closure.

Generally, closure measures will include removal or closure in place of underground piping and other equipment. All wastes will be removed from the site and properly disposed in accordance with the rules and regulations in place at the time of closure. When all fluids, contaminants, and equipment have been removed from the site, the site will be graded as close to the original contour as possible.

Should contaminated soil be discovered, any necessary reporting under NMOCD Rule 116 and WQCC Section 1203 will be made and clean-up activities will commence. Post-closure maintenance and monitoring plans would not be necessary unless contamination is encountered.

Figure 1 Facility Topographic Map

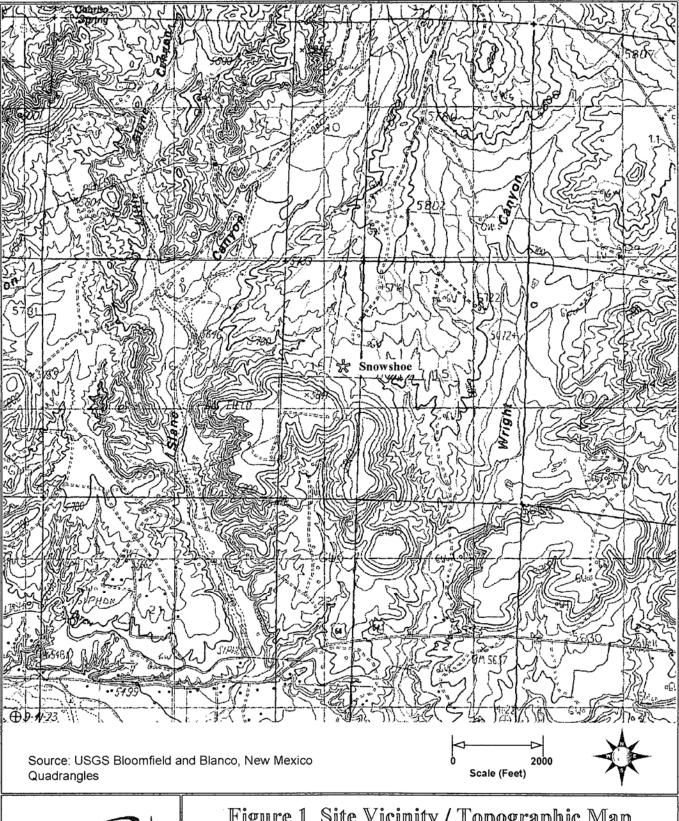


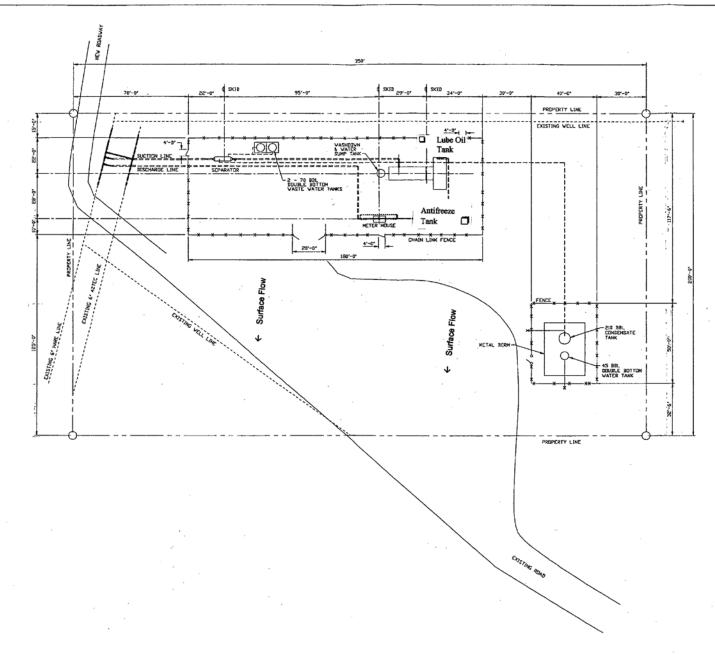


Figure 1 Site Vicinity / Topographic Map Snowshoe Compressor Station Section 15, Township 29N Range 10W San Juan County, New Mexico

Figure 2 Facility Plot Plan



2-2-46.



LEGEND

EXERGENCY SHUTDON

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DEDOCD BY TORRE ALTA GATHERING SYSTEM



Four Corners Area Environmental Department #188 County Road 4900 Bloomfield, N.M. 87413 Phone: (505) 632-4825 Fax: (505) 632-4781

July 25, 2007

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Bureau of Land Management; 1235 N. La Plata Highway Farmington, NM 87401

Dear Madam/Sir:

This letter is to advise you that Williams Four Corners, LLC is preparing to submit to the Oil Conservation Division a Discharge Plan renewal application for the Snowshoe Compressor Station. This notice is a requirement pursuant to New Mexico Water Quality Control Commission Regulations. We expect to submit the Discharge Plan application to the Oil Conservation Division during July 2007.

The facility, located in Section 15, Township 29 North, Range 10 West, San Juan County, New Mexico, approximately 6 miles east of Bloomfield, provides natural gas compression and conditioning services.

The discharge permit addresses how spills, leaks, and other accidental discharges to the surface will be managed. The facility <u>does not</u> discharge wastewater to surface or subsurface waters. All wastes generated will be temporarily stored in tanks or containers. Waste shipped offsite will be disposed or recycled at a facility permitted by state, federal, or tribal agency to receive industrial solid waste. In the event of an accidental discharge, ground water most likely will not be affected. The estimated ground water depth at the site is 50 to 200 feet. The total dissolved solids concentration of area ground water is expected to be in the range of 200-2,000 parts per million.

Comments or inquiries regarding this permit or the permitting process may be directed to:

Director of the Oil Conservation Division 1220 South Saint Francis Dr. Santa Fe NM 87505

Respectfully submitted.

Monica Sandoval
Ehl&S Specialist

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Environmental Department 188 County Road 4900 Bloomfield, NM 87413 505/632-4625 505/632-4781 Fax

November 7, 2007

Mr. Leonard Lowe Oil Conservation Division, EMNRD 1220 South St. Francis Drive Santa Fe, New Mexico 87505

RE: Update to Williams Four Corners, LLC OCD Discharge Plans

Dear Mr. Lowe,

Williams Four Corners, LLC (Williams) would like to update the "Description of Final Disposition" for wastes generated at its facilities, and to include clarification of sources of waste streams not previously specified in its existing OCD Discharge Plans. These items are discussed in Table 1, "Storage and Disposal of Process Fluids, Effluent and Waste Solids", and Table 2, "Source, Quantity, and Quality of Effluent and Waste Solids", in each of Williams' current facility-specific OCD Discharge Plans. (Note that in older plans, these table numbers are reversed).

More specifically, the updates to Table 1 include replacing language that stated waste would be disposed at "NMOCD-approved" or simply "approved" disposal facility with text that states waste will be disposed at "any state, federal, or tribal agency to receive industrial solid waste. Any waste that is determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such hazardous waste." Recently, Williams has had some difficulty using NMED-approved disposal sites due to the current language.

Updates to Table 2 include expanding the "Source" of "Used Process Filters" to include amine filters, charcoal, activated carbon, and molecular sieve in addition to the air, inlet, fuel, fuel gas and glycol filters typically included in the Discharge Plans. Additionally, the "Source" of "Condensate and/or Produced Water" has been expanded to include the inlet scrubber, gas inlet separator, and dehydrators. These changes are included for clarification purposes only and provide a more descriptive list of waste that may be generated at the facilities. All of the items listed are related to existing processes at the facilities.

Please see the attached Table 1 and Table 2, from the recent OCD Discharge Plan renewal application for Williams' Rosa Compressor Station, for an example of how the updates apply at a typical Williams' facility. The updated information is indicated by bold text. We will update this information in each OCD Discharge Plan as it comes up for renewal. In the meantime, we request that the updates described herein are effective immediately for the sites listed below upon your receipt of this letter.

Five Points (GW-078)
29-6#2 (GW-121)
29-6#3 (GW-198)
29-6#4 (GS-122)
30-5 (GW-108)
31-6 (GW-118)
32-7 (GW-117)
32-8#2 (GW-111)
32-8#3 (GW-116)
32-9 (GW-091)
Aztec (GW-155)
Blanco (GW-327)
Cabresto (GW-352)
Carracas (GW-112)
Cedar Hill (GW-087)
Chaco (GW-331)
Coyote (GW-250)
Crouch Mesa (GW-129)
Culpepper (GW-353)
Decker Junction (GW-134)
Dogie (GW-330)
El Cedro (GW-149)
Glade (GW-321)
Hare (GW-343)
Honolulu (GW-315)
Horse Canyon (GW-061)
Horton (GW-323)

La Cosa (GW-187) Laguna Seca (GW-307) La Jara (GW-223) Lateral N-30 (GW-256) Lawson Straddle (GW-322) Lybrook (GW-047) Manzanares (GW-062) Martinez (GW-308) Middle Mesa (GW-064) Milagro (GW-060) Navajo (GW-182) North Crandell (GW-310) Pipkin (GW-120) Pritchard (GW-274) Pump Mesa (GW-063) Quintana Mesa (GW-309) Richardson (GW-320) Sims Mesa (GW-068) Snowshoe (GW-287) Thompson (GW-328) Trunk A (GW-248) Trunk B (GW-249) Trunk C (GW-257) Trunk L (GW-180) Trunk M (GW-181) Trunk N (GW-306) Wildhorse (GW-079)

These updates are not significant and do not pose a hazard to public health or undue risk to property. These facilities <u>do not</u> discharge wastewater to surface or subsurface waters. All wastes generated at these facilities are temporarily stored in tanks or containers.

Respectfully submitted,

Kernaghan (GW-271)

David Bays

Senior Environmental Specialist

and Bay-

Attachment

Table 1
Transfer, Storage and Disposal of Process Fluids, Effluent and Waste Solids

PROCESS FLUID/WASTE	STORAGE	STORAGE CAPACITY (approximate)	CONTAINMENT/ SPILL PREVENTION	RCRA STATUS	DESCRIPTION OF FINAL DISPOSITION
Used Oil	Above Ground Storage Tank	500 gal*	Berm or concrete pad and wastewater system	Non- exempt	May be hauled to a Williams or contractor consolidation point before transport to EPA-registered used oil marketer for recycling.
Produced Water/Natural Gas Condensate	Above Ground Storage Tank	300 bbl 120 bbl 40 bbl	Berms	Exempt	Saleable liquids may be sold to refinery. The remaining liquids may be transported to a Williams' evaporation facility or may be disposed at any facility permitted by any state, federal, or tribal agency to receive industrial solid waste. Any waste that is determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such hazardous waste.
Wash-down Water	Below Grade Sump, vaulted	70 bbl 45 bbl	Dual-walled tanks	Non- exempt	Contractor may pump wash water back into truck after washing; water may be transported to any facility permitted by any state, federal, or tribal agency to receive industrial solid waste; or evaporation at Williams' facility may be considered. Any waste that is determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such waste.
Used Oil Filters	Drum or other container	Varies	Transported in drum or other container	Non- exempt	Transported to a Williams or contractor consolidation point, drained, and ultimately transported for disposal at any facility permitted by any state, federal, or tribal agency to receive industrial solid waste. Any waste that is determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such hazardous waste. A Waste Acceptance Profile will be filed with the disposal facility as necessary. Recycling options may be considered when available.
Used Process Filters	Drum or other container	Varies	Transported in drum or other container	Exempt	Transported to a Williams or contractor consolidation point, drained, and ultimately transported for disposal at any facility permitted by any state, federal, or tribal agency to receive industrial solid waste. Any waste that is determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such hazardous waste. A Waste Acceptance Profile will be filed with the disposal facility as necessary. Recycling options may be considered when available.
Spill Residue (e.g., soil, gravel, etc.)	N/A	N/A	In situ treatment, land-farm, or alternate method	Incident dependent	Per Section VI, Remediation, in 8/13/93 NMOCD Guidelines for Remediation of Leaks, Spills, and Releases.
Used Absorbents	Drum or other container	Varies	Transported in drum or other container	Non- exempt	Transported to a Williams or contractor consolidation point, drained, and ultimately transported for disposal at any facility permitted by any state, federal, or tribal agency to receive industrial solid waste. Any waste that is determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such hazardous waste. A Waste Acceptance Profile will be filed with the disposal facility as necessary. Recycling options may be considered when available.
Empty Drums / Containers	N/A	N/A	Berm	Non - exempt	Barrels are returned to supplier or transported to a Williams or contractor consolidation point and ultimately recycled/disposed consistent with applicable regulations.
Antifreeze	Above Ground Storage Tank		Berm or concrete pad and wastewater system	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Glycol	Above Ground Storage Tank	500 gal* 125 gal* 100 gal*	Berm or concrete pad and wastewater system	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Lube Oil	Above Ground Storage Tank	500 gal*	Berm or concrete pad and wastewater system	N/A	Off-spec material recycled or disposed consistent with applicable regulations.

^{*}Number of tanks installed dependent on number of engines and dehydrators installed on site. Engines and dehydrators are installed or removed to meet demand.

Table 2 Source, Quantity, and Quality of Effluent and Waste Solids

PROCESS FLUID / WASTE	SOURCE	QUANTITY (Ranges)	QUALITY
Produced Water/Natural Gas Condensate	Inlet Scrubber, Gas Inlet Separator, Dehydrators	2000-8000 bbl/year	No Additives
Waste Water / Wash Down Water	Compressor and Dehy Skids	100-5000 gal/year/unit	Biodegradable soap and tap water with traces of used oil
Used Oil	Compressors	500-2000 gal/year/engine	Used Motor Oil w/ No Additives
Used Oil Filters	Compressors	50-500/year/engine	No Additives
Used Process Filters	Charcoal, Activated Carbon, Molecular Sieve	50-500 cubic yd/yr	No Additives
Used Process Filters	Air, Inlet, Fuel, Fuel Gas, Glycol, Amine, Ambitrol	75-500/year	No Additives
Empty Drums/Containers	Liquid Containers	0-80/year	No Additives
Spill Residue (i.e. soil, gravel, etc)	Incidental Spill	Incident Dependent	Incident Dependent
Used Adsorbents	Incidental Spill/Leak Equipment Wipe-down	Incident Dependent	No Additives

ATTACHMENT TO THE DISCHARGE PLAN RENEWAL GW-287 WILLIAMS FIELD SERVICES COMPANY SNOWSHOE STRADDLE COMPRESSOR STATION DISCHARGE PLAN APPROVAL CONDITIONS

(September 23, 2002)

- 1. Payment of Discharge Plan Fees: The \$100.00 filing fee has been received by the OCD. There is a flat fee assessed for compressor stations with less than 1001 horsepower rating equal to \$400.00. The required flat fee may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the plan, with the first payment due upon receipt of this approval.
- Williams Field Services Company Commitments: Williams Field Services Company will abide
 by all commitments submitted in the discharge plan renewal application dated July 25, 2002
 and these conditions for approval.
- 3. <u>Waste Disposal</u>: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste determination per 40 CFR Part 261. Any waste stream that is not listed in the discharge plan will be approved by OCD on a case-by-case basis.
- 4. <u>Drum Storage:</u> All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.
- 5. Process Areas: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.
- 6. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.
- Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.
- 8. <u>Labeling:</u> All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.

- 9. <u>Below Grade Tanks/Sumps:</u> All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must demonstrate integrity on an annual basis. Integrity tests include pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing.
- 10. <u>Underground Process/Wastewater Lines:</u> All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity every 5 years. The permittee may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.
- 11. <u>Class V Wells</u>: No Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.
- 12. <u>Housekeeping:</u> All systems designed for spill collection/prevention will be inspected by a Williams Field Services Company's representative on a regular basis and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained for a period of five years.
- 13. <u>Spill Reporting:</u> All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Aztec District Office.
- 14. <u>Transfer of Discharge Plan:</u> The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.
- 15. Storm Water Plan: Williams Field Services Company, Inc. shall maintain storm water runoff controls. As a result of Williams Field Services Company, Inc.'s operations any water contaminant that exceeds the WQCC standards listed in 20 NMAC 6.2.3101 is discharged in any storm water runoff then Williams Field Services Company, Inc. shall notify the OCD within 24 hours, modify the plan within 15 days and submit for OCD approval. Williams Field Services Company shall also take immediate corrective actions pursuant to Item 12 of these conditions.

- 16. Closure: The OCD will be notified when operations of the Snowshoe Straddle Compressor Station are discontinued for a period in excess of six months. Prior to closure of the Snowshoe Straddle Compressor Station a closure plan will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.
- 17. <u>Certification:</u> Williams Field Services Company, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Williams Field Services Company further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Accepted:

WILLIAMS FIELD SERVICES COMPANY.

Title SR. ENVIRONMONTH SPEUDING



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Betty Rivera
Cabinet Secretary

September 23, 2002

Lori Wrotenbery
Director
Oil Conservation Division

<u>CERTIFIED MAIL</u> <u>RETURN RECEIPT NO. 3929 9130</u>

Mr. Michael K. Lane Williams Field Services Company 188 CR 4900 Bloomfield, New Mexico 87413

RE:

Discharge Plan Renewal Approval GW-287

Williams Field Services Company

Snowshoe Straddle Compressor Station

San Juan County, New Mexico

Dear Mr. Lane:

The ground water discharge plan renewal GW-287 for the Williams Field Services Company Snowshoe Straddle Compressor Station located in the SW/4 NW/4 of Section 15, Township 29 North, Range 10 West, NMPM, San Juan County, New Mexico, is hereby approved under the conditions contained in the enclosed attachment. Enclosed are two copies of the conditions of approval. Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 30 days of receipt of this letter.

The original discharge plan application was submitted on September 11, 1997 and approved November 24, 1997. The discharge plan renewal application, dated July 25, 2002, was submitted pursuant to Sections 5101.B.3. of the New Mexico Water Quality Control Commission (WQCC) Regulations. The discharge plan is renewed pursuant to Sections 5101.A. and 3109.C. Please note Section 3109.G., which provides for possible future amendment of the plan. Please be advised that approval of this plan does not relieve Williams Field Services Company of liability should operations result in pollution of surface water, ground water, or the environment.

Please be advised that all exposed pits, including lined pits and open tanks (tanks exceeding 16 feet in diameter), shall be screened, netted, or otherwise rendered nonhazardous to wildlife including migratory birds.

Please note that Section 3104 of the regulations provides: "When a plan has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3107.C., Williams Field Services Company is required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

Mr. Michael K. Lane GW-287 Snowshoe Straddle Compressor Station July 10, 2002 Page 2

Pursuant to Section 3109.H.4., this discharge plan is for a period of five years. This plan will expire on November 24, 2007, and Williams Field Services Company should submit an application in ample time before this date. Note that under Section 3106.F. of the regulations, if a discharger submits a discharge plan renewal application at least 120 days before the discharge plan expires and is in compliance with the approved plan, then the existing discharge plan will not expire until the application for renewal has been approved or disapproved. It should be noted that all discharge plan facilities will be required to submit the results of an underground drainage testing program as a requirement for discharge plan.

The discharge plan application for the Williams Field Services Company Snowshoe Straddle Compressor Station is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan renewal application will be assessed a non-refundable fee equal to the filing fee of \$100. There is a flat fee assessed for compressor stations with less than 1001 horsepower rating equal to \$400.00. The OCD has received the filing fee.

Please make all checks payable to: Water Management Quality Management Fund
C/o: Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505.

If you have any questions please contact Mr. W. Jack Ford at (505) 476-3489. On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge plan review.

Sincerely,

Roger C. Anderson

Chief, Environmental Bureau Oil Conservation Division

RCA/wjf Attachment

xc: OCD Aztec District Office



ATTACHMENT TO THE DISCHARGE PLAN RENEWAL GW-287 WILLIAMS FIELD SERVICES COMPANY SNOWSHOE STRADDLE COMPRESSOR STATION DISCHARGE PLAN APPROVAL CONDITIONS (September 23, 2002)

- 1. Payment of Discharge Plan Fees: The \$100.00 filing fee has been received by the OCD. There is a flat fee assessed for compressor stations with less than 1001 horsepower rating equal to \$400.00. The required flat fee may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the plan, with the first payment due upon receipt of this approval.
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 by all commitments submitted in the discharge plan renewal application dated July 25, 2002
 and these conditions for approval.
- 3. <u>Waste Disposal</u>: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste determination per 40 CFR Part 261. Any waste stream that is not listed in the discharge plan will be approved by OCD on a case-by-case basis.
- 4. <u>Drum Storage:</u> All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.
- 5. Process Areas: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.
- 6. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.
- 7. <u>Above Ground Saddle Tanks:</u> Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.
- 8. <u>Labeling:</u> All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.

- 9. <u>Below Grade Tanks/Sumps:</u> All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must demonstrate integrity on an annual basis. Integrity tests include pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing.
- 10. <u>Underground Process/Wastewater Lines:</u> All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity every 5 years. The permittee may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.
- 11. Class V Wells: No Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.
- 12. <u>Housekeeping:</u> All systems designed for spill collection/prevention will be inspected by a Williams Field Services Company's representative on a regular basis and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained for a period of five years.
- Spill Reporting: All spills/releases will be reported pursuant to OCD Rule 116 and WQCC
 1203 to the OCD Aztec District Office.
- 14. <u>Transfer of Discharge Plan:</u> The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.
- 15. Storm Water Plan: Williams Field Services Company, Inc. shall maintain storm water runoff controls. As a result of Williams Field Services Company, Inc.'s operations any water contaminant that exceeds the WQCC standards listed in 20 NMAC 6.2.3101 is discharged in any storm water runoff then Williams Field Services Company, Inc. shall notify the OCD within 24 hours, modify the plan within 15 days and submit for OCD approval. Williams Field Services Company shall also take immediate corrective actions pursuant to Item 12 of these conditions.

- 16. <u>Closure:</u> The OCD will be notified when operations of the Snowshoe Straddle Compressor Station are discontinued for a period in excess of six months. Prior to closure of the Snowshoe Straddle Compressor Station a closure plan will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.
- 17. <u>Certification:</u> Williams Field Services Company, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Williams Field Services Company further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Accepted:
WILLIAMS FIELD SERVICES COMPANY.
by
Title

NOTICE OF PUBLICATION

STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to the New Mexico Water Quality Control Commission Regulations, the following discharge plan application has been submitted to the Director of the Oil Conservation Division, 1220 South Saint Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

(GW-287) - Williams Field Service, Mark J. Barets, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan renewal application for their Snowshoe Straddle Compressor Station located in the NW4, Section 15, Township 29 North, Range 10 West, NMPM, San Juan County, New Mexico. All wastes generated will be stored in closed top receptacles prior to offsite disposal or recycling at an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of 28 feet with a total dissolved solids concentration of 6,225 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday thru Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any interested person. Request for public hearing shall set forth the reasons why a hearing shall be held.

A hearing will be held if the director determines that there is significant public interest.

If no hearing is held, the Director will approve or disapprove the plan based on the information available. If a public hearing is held, the Director will approve the plan based on the information in the plan and information presented at the hearing.

GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 12th day of August, 2002.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

LORI WROTENBERY, Director

SEAL

ATTACHMENT TO THE DISCHARGE PLAN GW-287 WILLIAMS FIELD SERVICES SNOWSHOE STRADDLE COMPRESSOR STATION DISCHARGE PLAN APPROVAL CONDITIONS (November 24, 1997)

- 1. <u>Williams Commitments:</u> Williams will abide by all commitments submitted in the discharge plan application dated September 11, 1997.
- 2. <u>Waste Disposal</u>: All wastes shall be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous by characteristics may be disposed of at an OCD approved facility upon proper waste characterization per 40 CFR Part 261.
- 3. <u>Drum Storage:</u> All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.
- 4. <u>Process Areas:</u> All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.
- 5. <u>Above Ground Tanks:</u> All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new facilities or modifications to existing facilities must place the tank on an impermeable type pad within the berm.
- 6. <u>Above Ground Saddle Tanks:</u> Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.
- 7. <u>Labeling:</u> All tanks, drums and containers should be clearly labeled to identify their contents and other emergency information necessary if they were to rupture, spill, or ignite.
- 8. <u>Below Grade Tanks/Sumps</u>: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must demonstrate integrity on an annual basis. Integrity tests include pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing.

- 9. <u>Underground Process/Wastewater Lines:</u> All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity at present and then every 5 years thereafter, or prior to discharge plan renewal. Permittees may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.
- 10. <u>Class V Wells</u>: Leach fields and other wastewater disposal systems at OCD regulated facilities which inject fluid other than domestic waste sewage below the surface are considered Class V injection wells under the EPA UIC program. All class V wells will be closed unless, it can be demonstrated that protectable groundwater will not be impacted in the reasonably foreseeable future. Class V wells must be closed through the Santa Fe Office. The OCD allows industry to submit closure plans which are protective of human health, environment and groundwater as defined by the WQCC, and are cost effective.
- 11. <u>Housekeeping:</u> All systems designed for spill collection/prevention should be inspected to ensure proper operation and to prevent overtopping or system failure.
- 12. <u>Spill Reporting:</u> All spills/releases shall be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Aztec District Office.
- 13. <u>Transfer of Discharge Plan:</u> The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.
- 14. <u>Closure:</u> The OCD will be notified when operations of the facility are discontinued for a period in excess of six months. Prior to closure of the facility a closure plan will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.
- 15. <u>Certification:</u> Williams, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Williams further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Accepted:

WILLIAMS EIELD SERVICES

Title Sr. Envi'l Specalist



STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

2040 S. PACHECO SANTA FE, NEW MEXICO 87505 (505) 827-7131

November 24, 1997

CERTIFIED MAIL RETURN RECEIPT NO. P-288-258-998

Ms. Ingrid A. Deklau Williams Field Services 295 Chipeta Way P.O. Box 58900, M.S. 2G1 Salt Lake City, Utah 84158-0900

RE: Discharge Plan GW-287

Snowshoe Straddle Compressor Station

San Juan County, New Mexico

Dear Ms. Deklau:

The ground water discharge plan GW-287, for the Williams Field Services (Williams) Snowshoe Straddle Compressor Station located in the NW/4 of Section 15, Township 29 North, Range 10 West, NMPM, San Juan County, New Mexico, is hereby approved under the conditions contained in the enclosed attachment. The discharge plan consists of the discharge application dated September 11, 1997. Enclosed are two copies of the conditions of approval. Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 10 working days of receipt of this letter.

The discharge plan was submitted pursuant to Section 3106 of the New Mexico Water Quality Control Commission (WQCC) Regulations. It is approved pursuant to Section 3109.A. Please note Sections 3109.E and 3109.F., which provide for possible future amendments or modifications of the plan. Please be advised that approval of this plan does not relieve Williams of liability should operations result in pollution of surface water, ground water, or the environment.

Please be advised that all exposed pits, including lined pits and open tanks (tanks exceeding 16 feet in diameter), shall be screened, netted, or otherwise rendered nonhazardous to wildlife including migratory birds.

Ms. Ingrid A. Deklau November 24, 1997 Page 2

Please note that Section 3104 of the regulations require "When a facility has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3107.C. Williams is required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

Pursuant to Section 3109.G.4., this plan is for a period of five years. This approval will expire on November 24, 2002, and Williams should submit an application in ample time before this date. Note that under Section 3106.F. of the regulations, if a discharger submits a discharge plan renewal application at least 120 days before the discharge plan expires and is in compliance with the approved plan, then the existing discharge plan will not expire until the application for renewal has been approved or disapproved. It should be noted that all discharge plan facilities will be required to submit the results of an underground drainage testing program as a requirement for discharge plan renewal.

The discharge plan renewal application for the Williams Field Services Snowshoe Straddle Compressor Station is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of \$50. The OCD has received the filing fee. There are no flat fees for compressor stations with a total combined horsepower of 1,000 or less.

On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge plan review.

Sincerely,

William J. LeM

WJL/mwa Attachment

Director

xc: OCD Aztec Office

ATTACHMENT TO THE DISCHARGE PLAN GW-287 WILLIAMS FIELD SERVICES SNOWSHOE STRADDLE COMPRESSOR STATION DISCHARGE PLAN APPROVAL CONDITIONS (November 24, 1997)

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- 13. Transfer of Discharge Plan: The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.
- 14. <u>Closure:</u> The OCD will be notified when operations of the facility are discontinued for a period in excess of six months. Prior to closure of the facility a closure plan will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.
- 15. <u>Certification:</u> Williams, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Williams further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

٠.,

P 288 258 998

Street & Number Post Office, State, & ZIP Code \$ Postage Certified Fee Special Delivery Fee Restricted Delivery Fee Return Receipt Showing to Whom & Date Delivered Return Receipt Showing to Whom Date, & Addressee's Address PS Form **3800**, TOTAL Postage & Fees Postmark or Date

GW-287

GENERAL CORRESPONDENCE

YEAR(S): 2006 - 1997

2008 AUG 23 AM 11 44



Environmental Department 188 County Road 4900 Bloomfield, NM 87413 505/632-4606 505/632-4781 Fax

August 22, 2006

Mr. Wayne Price New Mexico Oil Conservation Division Environmental Bureau 1220 South St. Francis Drive Santa Fe, NM 87505

Re:

Change of Company Name

Dear Mr. Price;

In accordance with Conditions of Discharge Plan Approval attached to each discharge plan approved by the New Mexico Oil Conservation Division, we hereby provide notice of a change of ownership for the Williams facilities identified in the attached table to Williams Four Corners, LLC.

As a corporate strategy, Williams has created regional limited liability corporations for our assets. So, although a new corporation has been created, Williams Four Corners LLC is still a wholly-owned unit of Williams, and there is no change of corporate ownership for these facilities. Williams will continue to comply with the terms and conditions of all approved discharge plans. All other administrative items (responsible official, environmental contacts, mailing addresses, etc.) remain unchanged.

If you have any questions, please call David Bays, Senior Environmental Specialist, at (505) 632-4951 or Ingrid Deklau of Cirrus Consulting at (801) 583-3107.

Sincerely,

David Bays

Senior Environmental Specialist

and Bays

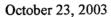
Attachments

xc:

Clara Cardoza Monica Sandoval WFS FCA file 210



Williams Energy Services-Enve 188 CR 4900 Bloomfield, NM 87413 505/632-4606 505/632-4781 Fax



Mr. Jack Ford Oil Conservation Division 1220 South St Francis Dr Santa Fe NM 87505

Re: Drain Line Testing Results at Various Williams Field Services Facilities

Dear Mr. Ford:

Williams Field Services conducted a facility review and drain line testing in accordance to the Oil Conservation Division Discharge Plan requirements. Subsurface, non-pressurized process and wastewater lines were tested. The facility drain line testing reports are enclosed with this letter. A review and testing summary is provided in the table below.

Facility	Permit #	Completion Date	Results	Comments
29-6 #2 CDP	GW-112	10/9/2003	Passed	
30-8 CDP	GW-133	8/12/2003	Passed	facility broke up into 2 test sections, both passed
31-6 CDP	GW-118	9/17/2003	Passed	Both WFS and WPX sides passed
32-7 CDP	GW-117	7/29/2003	Passed	facility broke up into 3 test sections, both passed
32-8 #3 CDP	GW-116	7/8/2003	Passed	
Aztec CDP	GW-155	8/18/2003	Passed	facility broke up into 3 test sections, both passed
Carracas CDP	GW-112	8/7/2003	Passed	
Decker Junction	GW-134	8/13/2003	Passed	
Rosa #1CS	GW-292	12/10/2002	Passed	
Sims Mesa CDP	GW-68	9/30/2003	Passed	facility broke up into 2 test sections, both passed
Snowshoe CS	GW-287	11/8/2002	Passed	
Trunk A CDP	GW-248	12/16/2002	Passed	
Trunk L CDP	GW-180	10/17/2003	Passed	
Trunk N CDP	GW-306	7/17/2003	Passed	

If you have any questions or require additional information, please contact me at (505) 632-4606.

Respectfully Submitted,

Clara M. Garcia

Environmental Compliance

Attachments: Drain Line Testing Reports

xc: FCA Environmental 220 File

Denny Foust, OCD Aztec

TEST REPORT

FM-07-0301 (Rev. 8-89)

FIELD PROOF TESTS OR LEAK TES

FM-07-0301 (Rev. 6-69)			W/8/02.			
Division & Region		Line No., System No.	. (If Gathering)		ocation & Test Number	
Milagno		drain	ines			
					Pipe Manufacturer	,
Swowsho	z Con	20			N/	
Diameter	Wall Thickness	7	Grade		Reference DWG. Numbers	S
UACIOUS Location Class	sch	8C	PVC		NA	
Location Class	Cons	struction Type		MAOP		Required Test Pressure
NA		NA			iv/A	6#
From Engineering Station - To Er	gineering Station			From M	ile Post To Mile Post	
NA					NA	
Other Limitations (Valve, fittings, e	tc.)			Length	of Test Section	
NA					20°	
Date Test Started		Date Test Completed		Weather	cold	
Į				1	Cenc	
Pressure-Pump Location-				Dead W	t. Location & Elevation	,©जर्मपु
Stand to	ube_				ri/A	
Test Medium			High	Pt. & Low I	t. Elev. Diff. from Dead Wt. L	ocation
Test Medium N/A					3'	

TIME	D.W. PRESSURE	AMB. TEMP.,ºF	GROUND TO PIPE TEMP, °F	GROUND TEMP, °F	REMARKS
Am	ri/A	ru/A	n:/p	ni/A	Test held por I hour
			,		,
					Serry,
					Service Courts
			DATA TAKEN BY	Tui	to hillite



Four Corners Area Environmental Department #188 CR 4900 Bloomfield, N.M. 87413

Phone: (505) 634-4956 Fax: (505) 632-4781

October 11, 2002

Water Management Quality Management Fund c/o: Oil Conservation Division 1220 South St. Francis Drive Santa Fe, NM 87505

Dear Sir or Madam:

Enclosed please find check number 1000492152, for the amount of \$400.00, to cover the discharge plan renewal fees for the following discharge plans:

Snowshoe Straddle Compressor Station

GW-287

\$400.00

Your assistance in processing this fee is greatly appreciated.

If you have any questions please contact me at (505) 634-4956.

Thank You,

Ethel Holiday

Environmental Compliance Specialist

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of choor cash received on	
from Williams Field Lorvices	
for Saushor Straddle C.S.	GW-287
Submitted by:	Date: 10/18/02
Submitted to ASD by:	Date:
Received in ASD by:	Date:
Filing Fee New Facility	Renewal V
Modification Other	
Organization Code <u>521.07</u>	Applicable FY 2001
To be deposited in the Water Quali	ty Management Fund.
Full Payment V or Annual	
	A A DEAN POTILITOR AND POTTON IT ALSO HAS A DEFLICATIVE MATERIADA ON THE DAY

THIS MULTI-TONE AREA OF THE DOCUMENT CHANGES COLOR GRADUALLY AND EVENLY FROM DARK TO LIGHT WITH DARKER AREAS BOTH TOP AND BOTTOM. IT ALSO HAS A REFLECTIVE WATERMARK ON THE BACK DARK TO THE ORDER OF TH

INVOICE NUMBER 010CT02	INVOICI T	BATCH NAME 0010621-FCA100207010	INVOICE	CRIPTION	NET AMOUNT
100102	20021001	0010621-FCA100207010	SNOWSHOE STRADDL	COMPRESSOR STATION-DISCH	400.0
•					
	PLIER NUMBER		SUPPLIER NAME		TOTAL AMOUNT
10/04/2002 40	665 NEW M	EXICO OIL CONSERVATION D	1		\$400.0

Ford, Jack

From:

Martin, Ed

Sent:

Tuesday, August 20, 2002 8:08 AM

To:

Farmington Daily Times (E-mail)

Cc:

Ford, Jack; Anaya, Mary

Subject:

Legal Notice

Please publish the attached legal notice, one time only, on or before Friday, August 23, 2002. Upon publication, forward to this office:

1. Publisher's affidavit.

2. Invoice. Our purchase order number is **03-199-000048** If you have any questions, please contact me.



Publ. Notice GW-287.Doc

Ed Martin

New Mexico Oil Conservation Division Environmental Bureau 1220 S. St. Francis Santa Fe, NM 87505

Phone: 505-476-3492 Fax: 505-476-3471 1220 S. St. Francis Santa Fe, NM 87505 Phone: 505-476-3492 Fax: 505-476-3471





Thank you.

То:	Carlsbad Current Argus			From:	Ed Martin			
Fax:	505-8	385-1066		Pages:	2			
Phone:	505-8	387-5501		Date:	8/20/2002			
Re:	Lega	I Notices		CC:	Jack Ford, Mary A	naya		
□ Urge	ent	☐ For Review	☐ Please	Comment	☐ Please Reply	☐ Please Recycle		
Please 2002.	publi	ish the attached	legal notic	ce, one time	only, on or befor	re Friday, August 23,		
Upon p	ublica	ation, please forw	ard to this	office:				
1. Pul	blishe	r's affidavit.						
2. Inv	oice.	Our purchase ord	ler number	is 03-199-05	0127			
If you h	nave a	any questions, plea	ase contac	ct me.				

NOTICE OF PUBLICATION

STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to the New Mexico Water Quality Control Commission Regulations, the following discharge plan application has been submitted to the Director of the Oil Conservation Division, 1220 South Saint Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

(GW-114) – Dowell Schlumberger, Mr. Darwin Thompson, 507 East Richey, Artesia, New Mexico 88210, has submitted a discharge plan renewal application for their Artesia Oilfield Pumping Service Company facility located in the S/2 SW/4, Section 4, Township 17 South, Range 26 East, NMPM, Eddy County, New Mexico. Approximately 250 gallons of waste water with a total dissolved solids concentration of approximately 1100 mg/l is stored in an above ground closed tank prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of 25 feet with total dissolved solids greater than 1500 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday thru Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any interested person. Request for public hearing shall set forth the reasons why a hearing shall be held. A hearing will be held if the director determines that there is significant public interest.

If no hearing is held, the Director will approve or disapprove the plan based on the information available. If a public hearing is held, the Director will approve the plan based on the information in the plan and information presented at the hearing.

GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 14th day of August 2002.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

AFFIDAVIT OF PUBLICATION

Ad No. 46657

STATE OF NEW MEXICO County of San Juan:

CONNIE PRUITT, being duly sworn says: That she is the Advertising Manager of THE DAILY TIMES, a daily newspaper of general circulation published in English at Farmington, said county and state, and that the hereto attached Legal Notice was published in a regular and entire issue of the said DAILY TIMES, a daily newspaper duly qualified for the purpose within the meeting of Chapter 167 of the 1937 Session Laws of the State of New Mexico for publication on the following day(s): Friday, August 23, 2002.

And the cost of the publication is \$79.80.

ON <u>8-26-02</u> CONNIE PRUITT appeared before me, whom I know personally to be the person who signed the above document.

My Commission Expires April 2, 2004.

COPY OF PUBLICATION

918

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NOTICE OF PUBLICATION

STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to the New Mexico Water Quality Control Commission Regulations, the following discharge plan application has been submitted to the Director of the Oil Conservation Division, 1220 South Saint Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

(GW-287) - Williams Field Service, Mark J. Barets, Senior Environmental Sr ecialist #188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan renewal application for their Snowshoe Straddle Compressor Station located in the NW4, Section 15, Township 29 North, Range 10 West, NMPM, San Juan County, New Mexico. All wastes generated will be stored in closed top receptacles prior to offsite disposal or recycling at an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of 28 feet with a total dissolved solids concentration of 6,225 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday thru Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any interested person. Request for public hearing shall set forth the reasons why a hearing shall be held.

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GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 12th day of August, 2002.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

SEAL

LORI WROTENBERY, Director

Legal No. 46657, published in The Daily Times, Farmington, New Mexico, Friday, August 23, 2002.

NOTICE OF PUBLICATION

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GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 12th day of August, 2002.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

LORI WROTENBERY, Director

SEAL

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

. •	
I hereby acknowledge receipt of ch	eck No dated 7/16/62,
or cash received on	_ in the amount of \$ [00.00
from Williams Field Services	
for Snow show Standello (5	6/1) 787 .
Submitted by:	Date: 1-8-02
Submitted to ASD by:	Date:
Received in ASD by:	Date:
Filing Fee New Facility	Renewal
Modification Other	
	
To be deposited in the Water Quali	ty Management Fund.
Full Payment V or Annual	
A OF THE DOCUMENT CHANGES COLOR GRADUALLY AND EVENLY FROM DARK TO LICHT WITH DARK	ED ADDAS BOTH TOD AND DOTTOM IT ALSO USE A DESIGNATIVE VILLED VIL
A STATE OF THE STA	ER RICHA BOTH TOP AND BOTTOM. IT ALSO HAS A REFLECTIVE WATERMARK ON THE BACK.

NEW MEXICO OIL CONSERVATION DI NM WATER QUALITY MGMT FUND 2040 S PACHECO

SANTA FE United States

PAY TO THE ORDER OF

NM 87504

mulaylill

Bank One, NA Illinois

Light diving to arrive integral rengal

INVOICE NUMBER	INVOIC	TE BATCH NAME	INVOICE SCRIPTION	NET AMOUNT
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 F. J. Communication of National Communication of the Commun	1. 002.00 1. 20.000 2.000 0.00	W MEXICO OIL CONSERVATION		\$100.0



Four Corners Area Environmental Department #188 CR 4900

Bloomfield, N.M. 87413 Phone: (505) 634-4956 Fax: (505) 632-4781

July 22, 2002

RECEIVED

Water Management Quality Management Fund c/o: Oil Conservation Division 1220 South St. Francis Drive Santa Fe, NM 87505

JUL 2 6 2002

Environmental Bureau
Oil Conservation Division

Dear Sir or Madam:

Enclosed please find check number 1000470277, for the amount of \$100.00, to cover the discharge plan renewal fee for the following discharge plan:

Snowshoe Straddle Compressor Station GW-287

\$100.00

Your assistance in processing this fee is greatly appreciated.

If you have any questions please contact me at (505) 634-4956.

Thank You,

Ethel Holiday

Environmental Compliance Specialist



Environmental Department #188 CR 4900 Bloomfield, N.M. 87413

Phone: (505) 634-4956 Fax: (505) 632-4781

July 22, 2002

Water Management Quality Management Fund c/o: Oil Conservation Division 1220 South St. Francis Drive Santa Fe, NM 87505

Dear Sir or Madam:

Enclosed please find check number 1000470277, for the amount of \$100.00, to cover the discharge plan renewal fee for the following discharge plan:

Snowshoe Straddle Compressor Station GW-287

\$100.00

Your assistance in processing this fee is greatly appreciated.

If you have any questions please contact me at (505) 634-4956.

Thank You,

Ethel Holiday

Environmental Compliance Specialist

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INVOIC	E NUMBER	INVOICE 20020	EPTE	BATCH NAME 0008013-FCA070207010	INVOICE I	DESCRIPTION		NET AMOUNT 100.00
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	07/16/2002	40665	NEW MEX	CICO OIL CONSERVATION D	I			·· \$100.00

MA1363(WESAP001) (AP)

PAY TO THE ORDER OF

NEW MEXICO OIL CONSERVATION DI NM WATER QUALITY MGMT FUND 2040 S PACHECO

SANTA FE United States

NM 87504

Bank One, NA Illingis

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 South First, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico Energy Minerals and Natural Resources

Oil Conservation Division 2040 South Pacheco Santa Fe, NM 87505 Revised March 17, 1999

Submit Original Plus I Copy to Santa Fe I Copy to Appropriate District Office

DISCHARGE PLAN APPLICATION FOR SERVICE COMPANIES, GAS PLANTS. REFINERIES, COMPRESSOR, AND CRUDE OIL PUMP STATIONS

(Refer to the OCD Guidelines for assistance in completing the application) Modification ☐ New Renewal 1. Type: Compressor Station (Snowshoe Compressor Station) 2. Operator: Williams Field Services Company Address: 188 CR 4900, Bloomfield, New Mexico 87413 Phone: (505) 632-4625 Contact Person: Michael K. Lane SW/4 NW/4 Section 15 Township 29 North Range 10 West 3. Location: Submit large scale topographic map showing exact location. Attach the name, telephone number and address of the landowner of the facility site. 4. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility. 5. Attach a description of all materials stored or used at the facility. 6. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included. Attach a description of current liquid and solid waste collection/treatment/disposal procedures. Attach a description of proposed modifications to existing collection/treatment/disposal systems. Attach a routine inspection and maintenance plan to ensure permit compliance. Attach a contingency plan for reporting and clean-up of spills or releases. 12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included. 13. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders. 14. CERTIFICATION I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief. Title: Senior Environmental Specialist Name: Michael K. Lane Date: 7/25/02 Signature:

DISCHARGE PLAN RENEWAL

SNOWSHOE COMPRESSOR STATION (GW-287)

Williams Field Services Company

July 2002

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Appendix A – WES Spill Control Procedures Appendix B – NMOCD Notification of Fire, Breaks, Spills, Leaks, and Blowouts

I. TYPE OF OPERATION

The Snowshoe Compressor Station was constructed in 1997 to provide metering, compression, and dehydration services to various producers for the gathering of natural gas for treatment and delivery through Williams Field Services (WFS) Kutz Plant.

II. <u>LEGALLY RESPONSIBLE PARTY</u>

Williams Field Services 188 CR 4900 Bloomfield, NM 87413 (505) 632-4625

Contact Person:

Michael K. Lane, Senior Environmental Specialist Phone and Address, Same as Above

III. LOCATION OF FACILITY

The Snowshoe Compressor Station is located in Section 15, Township 29 North, Range 10 West, in San Juan County, New Mexico, approximately 6 miles east of Bloomfield, New Mexico. A Site Location map is attached (USGS 7.5 Min. Quadrangles: Bloomfield and Blanco, New Mexico) as Figure 1. The facility layout is illustrated in Figure 2. All figures are attached following Section XI of the text.

IV. LANDOWNER

Williams Field Services is leasing the subject property from:

Bureau of Land Management 1235 N. La Plata Highway Farmington, NM 87401 (505) 599-8900

V. FACILITY DESCRIPTION

This facility is classified as a field compressor station and is unmanned. The air quality permit for this site has allowed the operation of one 637-hp engine. In addition, there are various storage tanks, support structures and ancillary equipment. Records related to facility operations are maintained at central office locations.

VI. SOURCE, QUANTITY, AND QUALITY OF EFFLUENTS AND WASTE SOLIDS

The source, quantity, and quality of effluent and waste solids generated at the compressor station are summarized in Table 1.

TABLE 1 SOURCE, QUANTITY, AND QUALITY OF EFFLUENT AND WASTE SOLIDS SNOWSHOE COMPRESSOR STATION

PROCESS FLUID/WASTE	SOURCE	QUANTITY (Ranges)	QUALITY
Used Oil	Compressor	1000–2000 gal/year/engine.	Used motor oil w/no additives
Used Oil Filters	Compressor	50-100 filters/year/engine	No additives
Wash-down Water	Compressor Skid	500-1500 gal/year/engine	Biodegradable Soap and tap water w/traces of used oil
Natural Gas Condensate	Scrubber	1000-3000 bbl/year	No additives
Produced Water	Drawn of Natural Gas Condensate Tank, Gas Inlet Separator	200-500 bbl/year	No additives
Used Process Filters	Air, Inlet and Fuel Gas	75- 100/year	No additives
Empty Drums / Containers	Liquid Containers	10-40/year	No additives
Spill Residue (i.e., gravel, soil)	Incidental spills	Incident dependent	Incident dependent
Used Absorbents	Incidental spill/leak equipment wipe-down	Incident dependent	No additives

VII. TRANSFER, STORAGE, AND DISPOSAL OF PROCESS FLUIDS, EFFLUENTS AND WASTE SOLIDS

Wastes generated at this facility fall into two categories: exempt and non-exempt. Exempt wastes include, but may not be limited to, used process filters, condensate spill cleanups (spill residue), certain absorbents, and produced water with or without de minimus quantities of non-hazardous liquids. Non-exempt wastes include, but may not be limited to, used oil, used oil filters, and engine coolant. Table 2 describes the transfer, storage and disposal of exempt and non-exempt process fluids, effluents, and waste solids expected to be generated at the site.

Non-exempt waste management will be conducted in accordance with NMOCD requirements including the preparation of a Certificate of Waste Status for each non-exempt waste stream. Non-exempt wastes will be analyzed at a minimum for BTEX, TPH, RCRA D-List metals, ignitability, corrosivity, and reactivity to initially determine if such waste are hazardous as defined in 40 CFR Part 261. All wastes at the facility will be periodically surveyed for naturally occurring radioactive material (NORM) to determine if the concentrations of radium 226 exceed 30 picocuries per gram or if radiation exposure exceeds 50 microroentgens per hour. If affirmed, such materials will be handled and disposed in accordance with NMOCD NORM Regulations.

Barring facility modification and/or process changes, the classification of non-exempt wastes by laboratory analyses will be made once during the approval period of this plan. Subsequent laboratory analyses will be performed at the generator's discretion (minimum of once every five years), or more frequently to comply with waste acceptance procedures of the disposal facility.

TABLE 2 TRANSFER, STORAGE, AND DISPOSAL OF PROCESS FLUIDS, EFFLUENTS, AND WASTE SOLIDS SNOWSHOE COMPRESSOR STATION

FLUID/WASTE CAPACIT		CONTAINER CAPACITY (approximate)	CONTAINMENT/ SPILL PREVENTION	RCRA STATUS	DESCRIPTION OF FINAL DISPOSITION							
Used Oil	Drum or other container Varies Transported to a WFS or contractor facility in drum or other container		Non-exempt	May be hauled to a WFS or contactor consolidation point before transport to EPA-registered used oil marketer for recycling.								
container Varies		Transported to a WFS or contractor facility in drum or other container	Non-exempt	Transported to a WFS or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.								
Natural Gas Condensate	210 hb		Berm	Exempt	Saleable liquids may be sold to refinery or liquid may be dispose NMOCD- approved facility.							
Produced Water Below-grade vaulted tank 45 bbl (2) 70 bbl		Berm	Non-Exempt	Water may be transported to NMOCD-approved facility; or evaporation at WFS facility may be considered in future.								
Wash-down Water Below-grade dual-walled tank 750 gallons		Berm	Non-Exempt	Water may be transported to NMOCD-approved facility; or evaporation at WFS facility may be considered in future.								
Used Process Filters	container varies contra		Transported to a WFS or contractor facility in drum or other container	Exempt	Transported to a WFS or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.							
Empty Drums / N/A N/A Containers		Berm	Non -exempt	Barrels are returned to supplier or transported to a WFS or contractor consolidation point and ultimately recycled/disposed consistent with applicable regulations.								
Spill Residue (i.e., soil, gravel)	N/A	N/A	In situ treatment, land- farm, or alternate method	Incident dependent	Per Section VI, Remediation, in 8/13/93 NMOCD Guidelines for Remediation of Leaks, Spills, and Releases.							
Used Absorbents	container Varies contractor facility in		Transported to a WFS or contractor facility in drum or other container	Non-exempt	Transported to a WFS or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.							
Ambitrol	Above ground storage tank			N/A	Off-spec material recycled or disposed consistent with applicable regulations.							
Compressor Oil Above ground storage tank (2) 500 gallons		Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.								

VIII. STORM WATER PLAN

This storm water section was developed to provide a plan to monitor and mitigate impact to storm water runoff from the facility. It serves to satisfy storm water management concerns of the NMOCD. It is not intended to comply with 40 CFR Part 122, Storm Water Discharges as this facility is excluded in 122.26 (c) (1) (iii).

This section concentrates on the identification of potential pollutants, inspection and maintenance of the pollutant controls, and gives a description of structural controls to prevent storm water pollution.

Site Assessment and Facility Controls

An evaluation of the material used and stored on this site that may be exposed to storm water indicates that no materials would routinely be exposed to precipitation. There are no engineered storm water controls or conveyances; all storm water leaves the site by overland flow.

Any leakage or spill from the identified potential pollutant sources, if uncontained by existing berms, curbs, or emergency response actions, could flow overland to open off-site drainage ditches (arroyos) and thus impact storm water. In such an event, containment would occur by blocking the ditch or culvert downstream of the pollutant. Cleanup of the substance and implementation of mitigation measures could be conducted while protecting downstream storm watercourses.

Best Management Practices

Following are Best Management Practices (BMPs) to be implemented to prevent or mitigate pollution to storm water from facility operations:

- All waste materials and debris will be properly disposed of on an on-going basis in appropriate containers and locations for collection and removal from the site.
- Temporary storage of potential pollutant sources will be located in areas with appropriate controls
 for storm water protection. This would include ensuring all containers are sealed/covered and
 otherwise protected from contact with precipitation.
- Periodic inspection of channels and culverts shall be performed at least twice annually and after any major precipitation event.
- Sediment deposits and debris will be removed from the channels and culverts as necessary and
 any erosion damage at the outfall (if any) will be repaired or controlled.
- Conduct inspections of the facility on a regular basis as part of the preventive maintenance site
 check. Such inspections will include the visual assessment of corroded or damaged drums and
 tanks, broken or breached containment structures, collapsed or clogged drainages or drain lines.

Implementation of the BMPs will prevent or mitigate impact to storm water runoff from this facility.

IX. INSPECTION, MAINTENANCE AND REPORTING

WFS's personnel will operate and maintain the compression unit at the facility. The facility will be remotely monitored for equipment malfunctions through Gas Dispatch. The facility will be visited several times per week at a minimum, and an operator will be on call 24 hours per day, 7 days per week, 52 weeks per year. The above ground and below-grade tanks will be gauged regularly, and monitored for leak detection.

In the event of a release of a reportable quantity, the operator reports the release to a WFS spill notification service. The service immediately notifies the WFS Environmental Department and all appropriate agencies.

X. SPILL/LEAK PREVENTION AND REPORTING (CONTINGENCY PLANS)

Spill containment berms around above ground storage tanks will be designed to contain 1-1/3 times the volume of the tank. The below-grade tanks will be constructed with a means of leak detection, and will either be double-walled tanks, double-bottomed tanks or a tank set on an impermeable pad.

WFS corporate policy and procedure for the controlling and reporting of Discharges or Spills of Oil or Hazardous Substances is provided in Appendix A. Significant spills and leaks are reported to the NMOCD pursuant to NMOCD Rule 116 and WQCC 1-203 using the NMOCD form (see Appendix B).

XI. SITE CHARACTERISTICS

The Snowshoe Compressor Station is located approximately 6 miles east of Bloomfield, New Mexico. The site elevation is approximately 5650 feet above mean sea level. The natural ground surface topography slopes downward toward the south. The maximum relief over the site is approximately 10 feet. Intermittent flow from the site will follow the unnamed drainage towards the south. The drainage flows to approximately 2 miles south-southwest to the San Juan River. The San Juan River, at approximately 5,480 feet in elevation, is the nearest down-gradient perennial source of surface water to the site.

A review of the available hydrologic data^{1,2,3} for this area revealed that there are no water wells within a 1/4-mile radius of Snowshoe Compressor Station. The water-bearing unit in the area is the Nacimiento Formation. This formation consists of a sequence of interbedded sandstone and mudstone. The estimated ground water depth at the site is 50 to 200 feet. The total dissolved solids concentration of area ground water is expected to range from 200 to 2,000 parts per million.

The 100-year 24-hour precipitation event at a regional weather station is 2.8 inches. This small amount of rainfall for the area should pose no flood hazards. Vegetation in the area consists predominantly of sagebrush and native grasses

Flood Protection: Surface water runoff from the area surrounding the site will be diverted around the facility into the natural drainage path.

References

¹Stone, W.J., Lyford, F.P., Frenzel, P.F., Mizell, N.H., Padgett, E.T., 1983, Hydrology and Water Resources of San Juan Basin, New Mexico Bureau of Mines and Mineral Resources, Hydrologic Report 6.

²Online Well Reports and Downloads, New Mexico Office of the State Engineer, 2000.

XII. FACILITY CLOSURE PLAN

All reasonable and necessary measures will be taken to prevent the exceedence of WCQQ Section 3103 water quality standards should WFS choose to permanently close the facility. WFS will submit a detailed closure plan to the NMOCD prior to closure.

Generally, closure measures will include removal or closure in place of underground piping and other equipment. All wastes will be removed from the site and properly disposed in accordance with the rules and regulations in place at the time of closure. When all fluids, contaminants, and equipment have been removed from the site, the site will be graded as close to the original contour as possible.

Should contaminated soil be discovered, any necessary reporting under NMOCD Rule 116 and WQCC Section 1203 will be made and clean-up activities will commence. Post-closure maintenance and monitoring plans would not be necessary unless contamination is encountered.

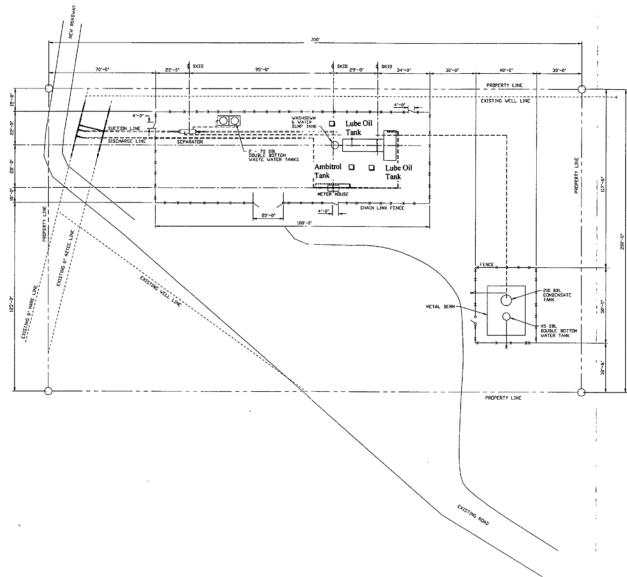
FIGURE 1

SITE VICINITY / TOPOGRAPHIC MAP

FIGURE 2

SITE PLAN

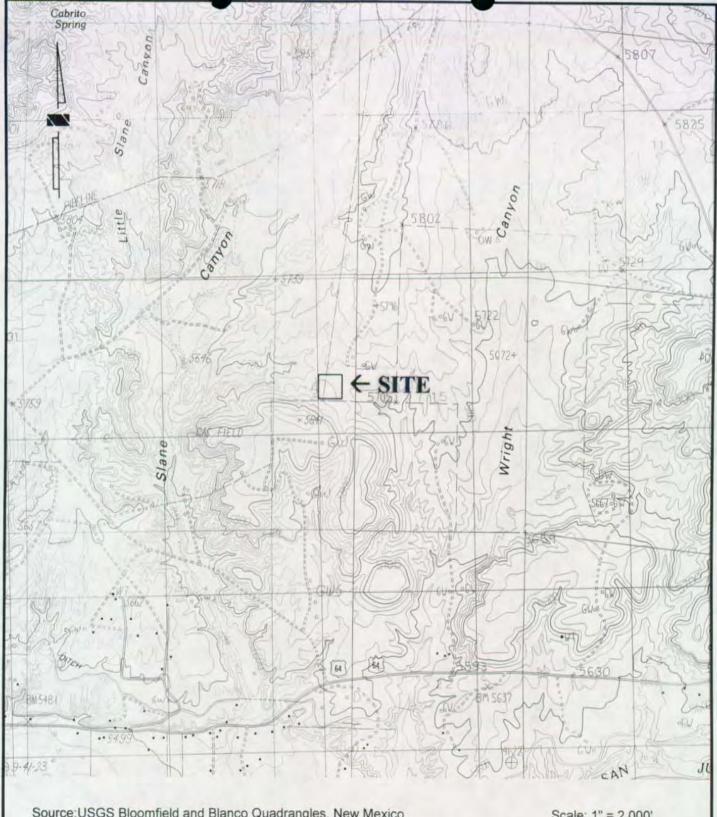
EMERGENCY SHUTDOWN SYSTEM DIAGRAM



LEGEND

■ EMERGENCY SHUTDOWN STATION

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Source: USGS Bloomfield and Blanco Quadrangles, New Mexico

Scale: 1" = 2,000'



Figure 1 Site Vicinity / Topographic Map **Snowshoe Compressor Station**

Section 15, Township 29N Range 10W San Juan County, New Mexico



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Betty Rivera
Cabinet Secretary

July 10, 2002

Lori Wrotenbery
Director
Oil Conservation Division

<u>CERTIFIED MAIL</u> RETURN RECEIPT NO. 3929 9017

Mr. Mark Bareta Williams Field Services 188 CR 4900 Bloomfield, New Mexico 87413

RE: Discharge Plan Renewal Notice for Williams Field Services Facilities

Dear Mr. Bareta:

The OCD is providing Williams Field Services a six month notice that the following discharge plans expire.

GW-129 expires 11/25/2002 – Crouch Mesa Compressor Station GW-287 expires 11/24/2002 - Snowshoe Straddle Compressor Station

WOCC 3106.F. If the holder of an approved discharge plan submits an application for discharge plan renewal at least 120 days before the discharge plan expires, and the discharger is not in violation of the approved discharge plan on the date of its expiration, then the existing approved discharge plan for the same activity shall not expire until the application for renewal has been approved or disapproved. A discharge plan continued under this provision remains fully effective and enforceable. An application for discharge plan renewal must include and adequately address all of the information necessary for evaluation of a new discharge plan. Previously submitted materials may be included by reference provided they are current, readily available to the secretary and sufficiently identified to be retrieved. [12-1-95]

The discharge plan renewal application for each of the above facilities is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan renewal will be assessed a fee equal to the filing fee of \$100.00 plus a flat fee based upon the horsepower rating for gas processing facilities. The \$100.00 filing fee for each facility is to be submitted with the discharge plan renewal application and is nonrefundable.

Mr. Mark Bareta July 10, 2002 Page 2

Please make all checks payable to: NMED-Water Quality Management and addressed to the OCD Santa Fe Office. Please submit the original discharge plan renewal application and one copy to the OCD Santa Fe Office and one copy to the OCD Aztec District Office. Note that the completed and signed application form must be submitted with your discharge plan renewal request. (Copies of the WQCC regulations and discharge plan application form and guidelines are enclosed to aid you in preparing the renewal application. A complete copy of the regulations is also available on OCD's website at www.emnrd.state.nm.us/ocd/).

If any of the above sited facilities no longer has any actual or potential discharges and a discharge plan is not needed, please notify this office. If the Williams Field Services has any questions, please do not hesitate to contact Mr. W. Jack Ford at (505) 476-3489.

Sincerely,

Roger C: Anderson

Oil Conservation Division

cc: OCD Aztec District Office

SITE NAME	DISCHARGE PLAN#	CURRENT OCD PLAN # of Units/ HP	ACTUAL INSTALLS # of Units/ HP	AQB PERMITTED # of Units/ HP
Category 4 - Curren	t OCD Plan reflec	ts more units than actual ir	stall; AQB permit allows a	dditional installs
CARRACAS CDP	GW-112	2 units/895 HP ea	1 unit/895 HP	3 units/1378 HP ea
LA COSA C.S.	GW-187	8 units/ 1185 hp ea.	1 unit/2980 hp;	1 unit/2980 hp;
	<u> </u>		1 unit/1408 hp	4 units/1408 hp ea
Category 5 - Co	ırrent OCD Plan ı	eflects actual installations;	AQB permit allows addition	onal installs
30-5 #1CDP	GW-108	9 units/1088 HP ea.	9 units/1088 HP ea.	12 units/1374 HP ea.
30-8 CDP	GW-133	10 units/1085 HP ea	10 units/1085 HP ea	14 units/1375 HP ea
DECKER JUNCTION CDP	GW-134	10 units/895 HP ea	10 units/895 HP ea	16 units/1388 HP ea
SIMS MESA CDP	GW-68	7 units/895 HP ea ok	7 units/895 HP ea	10 units/1374 HP ea
LATERAL N-30 C.S.	GW-256	2 units/1117 HP ea	2 units/1117 HP ea	6 units/1356 HP ea
Category 6 - C	urrent OCD Plan	reflects actual installations	; all AQB permitted units a	re installed
29-6 #3CDP	GW-198	1 unit/1129 HP ea.	1 unit/1129 HP ea.	1 unit/1129 HP ea.
32-8 #3	GW-116	6 units; /total site HP 8178	6 units/1373 HP ea	6 units/1373 HP ea
AZTEC CDP	GW-155	12 units/1384 HP ea	12 units/1384 HP ea	12 units/1384 HP ea
HART MTN. BOOSTER C.S.	GW-208	2 units/895 HP ea	2 units/895 HP ea	2 units/1151 HP ea
KERNAGHAN STRADDLE	GW-271	2 units/895 HP ea	2 units/895 HP ea	2 units/1121 HP ea
PRITCHARD STRADDLE C.S.	GW-273	3 units/1270 HP ea	3 units/1270 HP ea	3 units/1279 HP ea
TRUNK C BOOSTER C.S	GW-257	2 units/1268 HP ea	2 units/1268 HP ea	2 units/1268 HP ea
LAGUNA SECA	GW-307	2 units/1375 HP & 1146 hp	2 units/1375 HP& 1146 hp	2 units/1232 HP ea
TRUNK G C.S.	GW-229	1 unit/1373 HP	1 unit/1373 HP	1 unit/1373 HP
NORTH CRANDELL	GW-310	1 Sup 8GTL; 1059 hp	1 Sup 8GTL; 1059 hp	1 Sup 8GTL; 1059 hp
SNOW SHOE STRADDLE	GW-287	1 Caterpilla 500 HP	1 Caterpilla 500 HP	1 Caterpilla 500 HP
5-POINTS	GW-78	1Wauk H24GL; 418 hp	1Wauk H24GL; 418 hp	1Wauk H24GL; 418 hp
GALLEGOS	GW-293	1 Wauk F18; 335 hp	1 Wauk F18; 335 hp	1 Wauk F18; 335 hp
WILD HORSE	GW-79	1 unit/540 HP	1 unit/540 HP	1 unit/538 HP
COYOTE SPRINGS	GW-250	1 unit/1367 HP	1 unit/1367 HP	1 unit/1367 HP
CROUCH MESA	GW-129	1 unit/110 HP	1 unit/110 HP	1unit/677 HP



295 Chipeta Way P.O. Box 58900 Salt Lake City, UT 84108 801/584-6543

801/584-7760

· 用口图 图 1 人 1.

April 2, 1998

Mr. Jack Ford New Mexico Oil Conservation Division 2040 South Pacheco Street Santa Fe, New Mexico 87505

RE: Integrity Testing of Underground Lines - Snowshoe Straddle Compressor Station

Dear Mr. Ford,

Enclosed for your records are copies of test reports for integrity testing conducted on underground lines at the following Williams Field Services Compressor Station:

Snowshoe Straddle (GW-287)

If you have any questions pertaining to this submittal, please call me at (901)-584-6543.

Sincerely,

Ingrid Deklau

Environmental Specialist

Enclosure

Xc: Denny Foust, Aztec OCD

13657 FORM 910 1239 (1-94) **FACILITY DESCRIPTION** 3-FACILITY LOCATION DISTRICT AREA STOWShoe Comp ST2 San Juan 5-PIPE MANUFACTURER 3A-SECTION TOWNSHIP RANGE 29N 10-XW 15 _ Transmission Gathering . Gathering

| Gathering | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmission | Transmissio **TEST SPECIFICATIONS** Leak 9-TEST BEGIN LOCATION 8-TYPE OF TEST END LOCATION DEAD WEIGHT ☐ Strength 🔀 Both PRESSURE PUMP STATIONS 10-REASON FOR TEST Repair AND HIGH POINT LOW POINT New Facility Pre-Test Retest ELEVATION Ves PRELIMINARY LEAK PRESSURE BEGIN STATION MINIMUM PRESSURE END STATION MINIMUM PRESSURE 200 615 REQUIRED TEST PRESSURE 1170
HIGH POINT MINIMUM PRESSURE 1159 LOW POINT MAXIMUM PRESSURE 11-PRESSURE DATA 1/16 min 12 10 max REQUIRED TEST DURATION TEST LIMITATIONS (VALVES, FITTINGS, ETC.) TEST, MEDIUM 4 Hours H2O Included Values open 12-TEST START 13-TEST COMPLETED 14-WEATHER DATE 11-14-97 HOUR DATE 1/-14-97 HOUR Overcast TIME D.W. PRESSURE AMB. TEMP. OF REMARKS 9: 15 AM 45 BEGIN PRESSURIZING CHECK FOR CEAKS TIGHTENED UNION HIGH VENT 9:45AM 45 200 45 CHECK FOR LEAMS TIGGITEN PACKING ON BAIL WALLES 615 10:05 AM 10:20 AM 1170 52 BEGAN TEST 52 10:37 Am 1172 10:50 AM 48 1176 50 1177 11:05 11:20 1178 50 50 11:56 1187 11 89 12:20 52 12150 11 99 55 TO STAY WITHIN LIWITS MESSURE 70 1160 DUE FURENSINE MISSUR 12 10 01:1 54 53 05:1 1:50 1155 51 51 2:20 11 59 end of Test 1159 APPROVALS DATA TAKEN BY: TEST APPROVED BY: DATE: TEST COMPANY: DISTRIBUTION: ORIGINAL — Project Engineer, COPY — Compliance, COPY — Originator

1-WORK ORDER NO.

OIL CONSERVATION DIVISION 2040 South Pacheco Street Santa Fe, New Mexico 87505 (505) 827-7131

February 2, 1998

CERTIFIED MAIL RETURN RECEIPT NO. Z-357-869-914

Ms. Ingrid A. Deklau Williams Field Services P.O. Box 58900 Salt Lake City, Utah 84108

RE: Si

Site Modifications Notification

GW-287, Snowshoe Straddle Compressor Station

San Juan County, New Mexico

Dear Ms. Deklau:

The OCD has received the site modification letter, dated January 26, 1998, from Williams Field Services for the Snowshoe Straddle Compressor Station GW-287 located in NW/4, Section 15, Township 29 North, Range 10 West, NMPM, San Juan County, New Mexico. The site modifications are approved without modification to the discharge plan.

Please note that Section 3104 of the regualtions requires that "When a plan has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3107.C Williams Field Services is required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the dischaarge of water quality or volume. Further, this approval does not relieve Williams Field Services from liability should operations result in contamination to the environment.

Sincerely,

W. Jack Ford, C.P.G.

Environmental Bureau

Oil Conservation Division

cc: Mr. Denny Foust - Aztec District Office

Z 357 869 914 ·

	US Postal Service Receipt for Cer No Insurance Coverage Do not use for Internatio Sent to Street & Number Post Office, State, & ZIP Cod	Provided. nal Mail (See reverse) Deklay
	Postage	\$
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	Special Delivery Fee	
LO.	Restricted Delivery Fee	
199	Return Receipt Showing to Whom & Date Delivered	
, Apri	Return Receiot Showing to Whom, Date, & Addressee's Address	
800	TOTAL Postage & Fees	\$
PS Form 3800, April 1995	Postmark or Date	w-287



FIELD SERVICES

January 26, 1998



Jack Ford New Mexico Oil Conservation Division 2040 South Pacheco Santa Fe, NM 87505

Re: Update to Snowshoe Straddle Compressor Station Discharge Plan GW-287

Dear Mr. Ford:

This letter serves as notification of updates to the GW-287 Snowshoe Straddle Compressor Station Discharge Plan.

- The 70-bbl waste water storage tank located near the separator in the
 northwestern portion of the facility has been moved directly to the south, as
 indicated in the drawing, for safety reasons. The size of the vault was increased
 in order to accommodate the installation of the 70-bbl waste water tank, formerly
 located in the southeastern portion of the facility, in the same vault.
- A 45-bbl waste water tank has replaced the 70-bbl tank in the southeastern portion of the facility.

If you have any questions, I can be reached at 801-584-6543. Your assistance in handling these matters is appreciated.

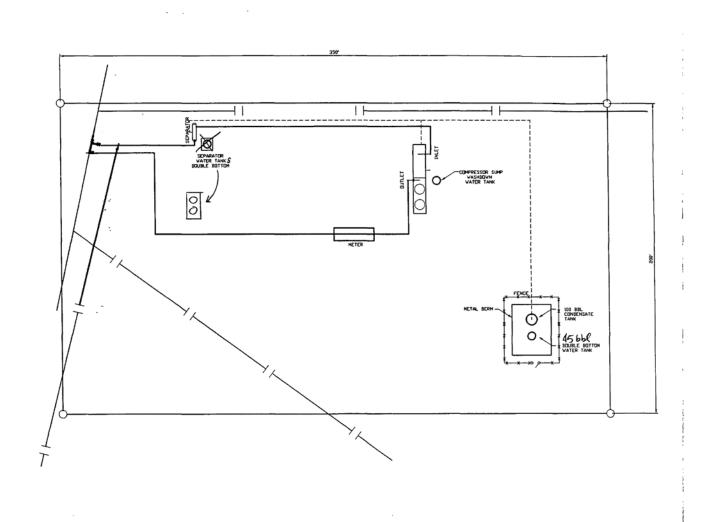
Best regards,

Ingrid A. Deklau

Senior Environmental Specialist

Enclosure

xc: Denny Foust, Aztec OCD

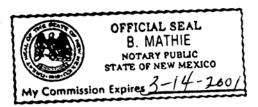


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The Santa Fe New Mexican

Since 1849. We Read You.

NIM OCD AD NUMBER: 703331 ACCOUNT: 56689 ATTN: SALLY MARTINEZ 2040 S. PACHECO ST. 62459 P.O. #: 98-199-000257 LEGAL NO: SANTA FE, NM 87505 LINES ONCE at \$ 87.20 218 Affidavits: 5.78 Total: AFFIDAVIT OF PUBLICATION OCT - 9 1997 STATE OF NEW MEXICO COUNTY OF SANTA FE 1, BETSY PERNER being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily news paper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a Newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication $\#_{62459}$ a copy of which is hereto attached was published in said newspaper once each WEEK for ONE consecutive week(s) and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the ___7__ day of OCTOBER 1997 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit. /s/ LEGAL ADVERTISEMENT REPRESENTATIVE Subscribed and sworn to before me on this 7 day of OCTOBER A.D., 1997 12-97-W



Notary Commission

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASE

	I hereby acknowledge rece	ipt of chec	ek No.	dated 9/12/97
	or cash received on		in the amount of	,
	from Williams	Lulo.	Leures	
	tor Inou shoe	Strado	ele C.S.	GW-287
:	Submitted by:		· Date:	OP No.
	Submitted to ASD by:	Man		10/20/97
	Received in ASD by:		Date:	<u> </u>
	Filing Fee X Ne	w Facility	Reneval	
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		Cape	-ij)	•
	Organization Code <u>52</u>	1.07	Applicable FY	98
	To be deposited in the W	ater Quali	ty Management Fo	ınd.
	Full Payment	or Annual	Increment	
P. O. Box 58			Chase Manhattan Bank 1201 Market Street Wilmington DE 19801	Delaware <u>62-26</u> 5736-09
Salt Lake Ci	ty, Utah 84158-0900	DATE	CHECK NO.	HET AMOUNT
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OF	NEW MEXICO OIL CONSERVATION IN WATER QUALITY MGMT FUND 2040 SOUTH PACHECO SANTA FE NM 87504	DI	May Jane Bitt	te

Williams Field Services Company

4341 NEW MEXICO OIL CONSERVATION DI

09/12/97

INVOICE			07/12/7/				
NUMBER	DESCRIPTION	INVOICE	AMOUNT	DISCOUNT	NET AMOUNT		
SNOW-STRAD	DISCHARGE APPLICAT	09/11/97	50.00	0.00	50.00		
			50.00	0.00	50.00		

PLEASE DETACH BEFORE DEPOSITING



September 11, 1997

Mr. Roger Anderson New Mexico Oil Conservation Division 2040 South Pacheco Street Santa Fe, New Mexico 87505 SEP 25 1997
Environment | Eur | u
Cil Conservation Division

Re:

Discharge Plan Application

Snowshoe Straddle Compressor Station

Dear Mr. Anderson:

641-787

Enclosed, please find the application, and a check for \$50.00 to cover the application fee for the Discharge Plan for Williams Field Services' (WFS') proposed Snowshoe Straddle Compressor Station.

If you have any questions or require additional information, please do not hesitate to contact me at (801) 584-6543. Your assistance in handling this matter is appreciated.

Sincerely,

Ingrid A. Deklau

Environmental Specialist

xc: Denny Foust, OCD Aztec District Office

enclosure



GW-287

FIELD SERVICES

October 14, 1997

Mr. Mark Ashley New Mexico Oil Conservation Division 2040 South Pacheco Santa Fe, New Mexico 87505

Re: Snowshoe Straddle Discharge Plan Application, submitted September, 1997

Dear Mr. Ashley,

Williams Field Services submitted a Discharge Plan application for a new facility, Snowshoe Straddle, to you for approval in September, 1997. The site engineer recently informed me that a change has been made in tankage to be installed at the site. Table 2 of our September submittal lists a natural gas condensate tank of 100-bbl capacity. The tank currently planned for installation is a 210-bbl tank.

Attached are two copies of the affected table that appears in our September submittal. The first copy highlights the occurrences of the 100-bbl tank. The second copy has been corrected to reflect the installation of a 210-bbl tank. Please replace the copy of the table you currently have with this updated version, and make it a part of our original discharge plan.

If you have any questions or require additional information, please don't hesitate to call me at (801) 584-6543.

Sincerely,

Ingrid Deklau

Environmental Specialist

enclosures

TABLE 2 - FROM SEPTEMBER, 1997 SUBMITTAL TRANSFER, STORAGE, AND DISPOSAL OF PROCESS FLUIDS, EFFLUENTS, AND WASTE SOLIDS SNOWSHOE STRADDLE COMPRESSOR STATION

PROCESS FLUID/WASTE	SOURCE	STORAGE	CONTAINER CAPACITY	CONTAINMENT/ SPILL PREVENTION	RCRA STATUS	DESCRIPTION OF FINAL DISPOSITION		
Natural Gas Condensate	Suction scrubber and three-phased separator	AST	100 bbl	Berm, to contain 1.3 times volume of tank	Exempt	Saleable condensate will be transported by Giant to their refinery		
Wash-down Water	Compressor skid	Below-grade sump	750 gallons	Double-walled tank with leak detection	Non-exempt	Removed using vacuum truck, and transported to Kutz Plant. Water will be discharged into facility's oil water separator, which is connected into waste water evaporation pond.		
Waste Water	Three-phased separator	Below-grade, open-top tank	70 bbl	Double-walled tank with leak detection	Exempt	Transported to Sunco or Basin Disposal.		
Waste Water	Drawn off 100- bbl condensate tank	Below-grade, open-top tank	70 bbl	Double-walled tank with leak detection	Exempt	Transported to Sunco or Basin Disposal.		
Used Oil Filters	Compressor	Not stored on site - immediately taken to Kutz Plant and drained	up to 55 gallons	Transported to Kutz Plant in drum or other container	Non-exempt	Filters will be taken to Kutz Plant, drained, and then transported to the San Juan County Regional Landfill. A Waste Acceptance Profile is on file at the landfill.		
Compressor Oil	For use in compressor	Drum	up to 55 gallons	Drum, with containment	N/A	N/A		
Used Oil	Compressor	Drum	up to 55 gallons	Will be removed from site immediately. If on-site storage necessary, drum will be stored in berm.	Non-exempt	Transported to an EPA-registered used oil marketer for recycling (i.e., Mesa Oil, EPA ID# NM0000096024)		

NOTICE OF PUBLICATION

STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan applications have been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(GW-94) - UNICHEM, Charles Root, (281) 631-8468, 14505 Torrey Chase Blvd., Suite 201, Houston, Texas 77014-1024, has submitted a discharge application for renewal of its previously approved discharge plan for the Hobbs Blending Plant located in the NW/4 NW/4 of Section 34, Township 18 South, Range 38 East, NMPM, Lea County, New Mexico. All wastes generated will be stored in closed top receptacles prior to offsite disposal or recycling at an OCD approved site. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 80 feet with a total dissolved solids concentration of approximately 800 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-287) - Williams Field Services, Ingrid Deklau, (801) 584-6543, 295 Chipeta Way, P.O. Box 58900, M.S. 2G1, Salt Lake City, Utah 84158-0900, has submitted a discharge application for the Snowshoe Straddle Compressor Station located in the S/2 NW/4 of Section 15, Township 29 North, Range 10 West, NMPM, San Juan County, New Mexico. All wastes generated will be stored in closed top receptacles prior to offsite disposal or recycling at an OCD approved site. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 28 feet with a total dissolved solids concentration of approximately 6,225 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan applications may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to ruling on any proposed discharge plan applications, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and a public hearing may be requested by any interested person. Requests for a public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed plans based on information available. If a public hearing is held, the Director will approve or disapprove the proposed plans based on the information in the discharge plan applications and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 29th day of September 1997.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

WILLIAM J. LEMAY. Director

SEAL



FIELD SERVICES

September 11, 1997

Mr. Roger Anderson New Mexico Oil Conservation Division 2040 South Pacheco Street Santa Fe, New Mexico 87505

Re: Discharge Plan Application

Snowshoe Straddle Compressor Station

Dear Mr. Anderson:

Enclosed, please find the application, and a check for \$50.00 to cover the application fee for the Discharge Plan for Williams Field Services' (WFS') proposed Snowshoe Straddle Compressor Station.

If you have any questions or require additional information, please do not hesitate to contact me at (801) 584-6543. Your assistance in handling this matter is appreciated.

Sincerely,

Ingrid A. Deklau

Environmental Specialist

xc: Denny Foust, OCD Aztec District Office

enclosure

State of New Mexico Energy, Minerals and Natural Resources Department OIL CONSERVATION DIVISION P.O. Box 2088

Santa Fe, NM 87501

DISCHARGE PLAN APPLICATION FOR NATURAL GAS PROCESSING PLANTS, OIL REFINERIES AND GAS COMPRESSOR STATIONS

(Refer to OCD Guidelines for assistance in completing the applications)

I.	TYPE: Natural Gas Compressor Station	Sio,;
II.	OPERATOR: Williams Field Services	
	ADDRESS: 295 Chipeta Way Salt Lake City, Utah	84158
	CONTACT PERSON: Ingrid Deklau	PHONE: 801-584-654
III.	LOCATION:/4/4 Section Township	ange 10W
IV.	Attach the name and address of the landowner(s) of the disposal facil	ity site.
v.	Attach description of the facility with a diagram indicating location of fe on the facility.	nces, pits, dikes, and tanks
VI.	Attach a description of sources, quantities and quality of effluent and	waste solids.
VII.	Attach a description of current liquid and solid waste transfer and sto	rage procedures.
/III.	Attach a description of current liquid and solid waste disposal proced	ures.
IX.	Attach a routine inspection and maintenance plan to ensure permit co	ompliance.
X.	Attach a contingency plan for reporting and clean-up of spills or release	ases.
XI.	Attach geological/hydrological evidence demonstrating that disposal adversely impact fresh water. Depth to and quality of ground water in	
XII.	Attach such other information as is necessary to demonstrate compli- rules, regulations and/or orders.	ance with any other OCD
KIII.	CERTIFICATION	
	I hereby certify that the information submitted with this application	is true and
	correct to the best of my knowledge and belief.	
	Name: Ingrid Delclan Title: Environn	rental Specialist-
	Signature: Date	e: 9/11/97
	/ \	

DISTRIBUTION: Original and one copy to Santa Fe with one copy to appropriate Division District Office.

DISCHARGE PLAN

TORRE ALTA GATHERING SYSTEM SNOWSHOE STRADDLE COMPRESSOR STATION

Williams Field Services Company

September 1997

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Appendix A - Waste Analysis

Appendix B - Spill Control Procedures

Appendix C - NMOCD Notification of Fire, Breaks, Spills, Leaks, and Blowouts

I. NAME OF FACILITY AND TYPE OF OPERATION

The Snowshoe Straddle Compressor Station will provide metering and compression services to a small group of producers for the gathering of natural gas on a contract basis for ultimate delivery through Williams Field Services (WFS) Kutz Plant in Bloomfield, New Mexico.

II. LEGALLY RESPONSIBLE PARTY

Williams Field Services 295 Chipeta Way P.O. Box 58900, M.S. 2G1 Salt Lake City, Utah 84158-0900 (801) 584-6543

Contact Person:

Ingrid A. Deklau, Sr. Environmental Specialist Phone and Address, Same as Above

III. LOCATION OF FACILITY

The Snowshoe Straddle Compressor Station will be located in the southern half of the NW/4 of Section 15, Township 29 North, Range 10 West, in San Juan County, New Mexico, approximately 6 miles east of Bloomfield. A Site Location map is attached as Figure 1. The site for this compressor station will be 1.6 acres. The site boundary survey is provided in Figure 2. The facility layout is presented in Figure 3.

IV. LANDOWNER

Bureau of Land Management 1235 Laplata Highway Farmington, NM 87401 505-599-8900

V. FACILITY DESCRIPTION

One (1) 500-horsepower (HP) Caterpillar engine is planned for operation at this site. The unit will be skid-mounted and self contained. This facility is classified as a field compressor station; consequently, there will be no formal office or other support facilities not essential to field compression.

VI. SOURCE, QUANTITY, AND QUALITY OF EFFLUENTS AND WASTE SOLIDS

The source, quantity, and quality of effluent and waste solids generated at the compressor station are summarized in Table 1. Material Safety Data Sheets for the type of oil expected to be used in the equipment were previously provided to New Mexico Oil Conservation Division (NMOCD)

by WFS. For reference, representative samples of wash-down waste water and used motor oil have previously been collected from the Cedar Hill CDP Compressor Station and analyzed for the parameters listed below.

Sample

Parameters

Wash-down Water

pH, TDS, TOX, TPH, BETX, As, Ba, Cd, Cr, Pb, Hg, Se, Ag.

Used Motor Oil

As, Cd, Cr, Pb, TOX, Flash Point

The results of previous tests conducted on similar waste streams showed that the wash-down water did not exhibit any of the hazardous characteristics and used motor oil was suitable for recycling (Appendix A). Additional chemicals listed in WQCC 1101.TT and 3-103 are not expected to be present in any process fluids or in the natural gas transported at the Snowshoe Straddle Compressor Station.

Used oil filters have been collected from representative WFS compressor stations and analyzed for TCLP Metals. The results of the analysis found that the filters did not exceed TCLP concentrations for metals. The analyses were submitted to the San Juan County Regional Landfill along with the Waste Acceptance Profiles. These profiles are updated every two years, or as required by the landfill.

TABLE 1
SOURCE, QUANTITY, AND QUALITY OF EFFLUENT AND WASTE SOLIDS
SNOWSHOE STRADDLE COMPRESSOR STATION

PROCESS FLUID/WASTE	SOURCE	QUANTITY	QUALITY						
Used Oil	Compressor	200 gal/yr	Used motor oil w/no additives						
Natural Gas Condensate	Suction Scrubber, Three-phased Separator	12,000 gal/yr	No additives						
Wash-down Water	Compressor Skid	1200 gal/yr	Soap and tap water w/traces of used oil						
Oil Filters	Compressor	12/yr	No additives						
Waste water	Suction Scrubber, Three-phased Separator	4000 gal/yr	Water and natural gas liquids						

VII. TRANSFER, STORAGE, AND DISPOSAL OF PROCESS FLUIDS, EFFLUENTS, AND WASTE SOLIDS

Table 2 describes the transfer, storage and disposal of process fluids, effluents, and waste solids expected to be generated at the site. The table also includes information regarding the type of container in which the waste stream will be stored, container capacity, and containment/spill prevention provisions.

TABLE 2
TRANSFER, STORAGE, AND DISPOSAL OF PROCESS FLUIDS, EFFLUENTS, AND WASTE SOLIDS SNOWSHOE STRADDLE COMPRESSOR STATION

PROCESS FLUID/WASTE	SOURCE	STORAGE	CONTAINER CAPACITY	CONTAINMENT/ SPILL PREVENTION	RCRA STATUS	DESCRIPTION OF FINAL DISPOSITION
Natural Gas Condensate	Suction scrubber and three-phased separator	AST	100 ррі	Berm, to contain 1.3 times volume of tank	Exempt	Saleable condensate will be transported by Giant to their refinery
Wash-down Water	Compressor skid	Below-grade sump	750 gallons	Double-walled tank with leak detection	Non-exempt	Removed using vacuum truck, and transported to Kutz Plant. Water will be discharged into facility's oil water separator, which is connected into waste water evaporation pond.
Waste Water	Three-phased separator	Below-grade, open-top tank	70 bbl	Double-walled tank with leak detection	Exempt	Transported to Sunco or Basin Disposal.
Waste Water	Drawn off 100-bbl condensate tank	Below-grade, open-top tank	70 bbl	Double-walled tank with leak detection	Exempt	Transported to Sunco or Basin Disposal.
Used Oil Filters	Compressor	Not stored on site - immediately taken to Kutz Plant and drained	up to 55 gallons	Transported to Kutz Plant in drum or other container	Non-exempt	Filters will be taken to Kutz Plant, drained, and then transported to the San Juan County Regional Landfill. A Waste Acceptance Profile is on file at the landfill.
Compressor Oil	For use in compressor	Drum	up to 55 gallons	Drum, with containment	N/A	N/A
Used Oil	Compressor	Drum	up to 55 gallons	Will be removed from site immediately. If on-site storage necessary, drum will be stored in berm.	Non-exempt	Transported to an EPA-registered used oil marketer for recycling (i.e., Mesa Oil, EPA ID# NM0000096024)

Exempt and non-exempt wastes will be managed separately. Only exempt wastes will be disposed down Class II injection wells. Non-exempt wastes will be characterized for hazardous constituents.

VIII. INSPECTION, MAINTENANCE, AND REPORTING

The facility will be visited several times per week at a minimum, and the facility will be remotely monitored for equipment malfunctions. The below-grade sump and the below-grade open-top tanks will be monitored monthly for leak detection. The AST will be gauged every two weeks.

In the event of a release of a reportable quantity, the operator reports the release to WFS Gas Control who immediately notifies the Environment, Health & Safety (EH&S) Department. WFS EH&S then reports the release to the NMOCD.

IX. SPILL/LEAK PREVENTION AND REPORTING (CONTINGENCY PLANS)

A spill containment berm around the condensate storage tank will be sized to contain 1 1/3 times the volume of the tank. Spill containment will also be provided around the tank loading valves. The condensate tank will be set on an impermeable pad. The entire condensate tank will be exposed to visually detect leaks.

Below-grade tanks will be set in vaults that provide ample clearance around all sides of the tank for visual inspection. All below-grade tanks will be double-bottomed. Drawings of the below-grade tanks are included in Figure 4.

Prior to facility start-up, all pressure vessels on site will be tested in accordance with the requirement of the ASME Boiler and Pressure Vessel Code. All interconnecting gas piping on site will be tested in accordance with the requirements of the ASME Code for Pressure Piping, B31.8 Gas Transmission and Distribution Piping Systems.

WFS corporate policy and procedure for the controlling and reporting of Discharges or Spills of Oil or Hazardous Substances is provided in Appendix B. Significant spills and leaks are reported to the NMOCD pursuant to NMOCD Rule 116 and WQCC 1-203 using the NMOCD form (see Appendix C).

X. SITE CHARACTERISTICS

The site elevation of the Snowshoe Straddle Compressor Station is approximately 5700 feet above mean sea level. The natural ground surface topography is relatively flat with a gentle slope downwards toward the south and east. The maximum relief over the site is approximately 16 feet. The surrounding area is covered by sagebrush, crested wheat grass, and native grasses.

Hydrologic Features: The proposed Snowshoe Straddle Compressor Station is located northwest of the central part of the San Juan Basin. The area is characterized by tertiary bedrock hill sides and mesas and Plio-Pleistocene gravel terraces along the San Juan River Valley and its major tributaries.

The major hydrologic influence in the Bloomfield area is the San Juan River, which flows from east to west approximately two miles south of the proposed site. The proposed site is at approximately 5700 feet above mean sea level, which is approximately 210 feet above the San Juan River and outside of the 100 year flood plain.

Slane Canyon is located approximately 3000 feet to the west of the proposed site, and there are several dry arroyos on all sides of the site.

Local groundwater in the general area of the site exists in an unconfined sandstone aquifer in the Nacimiento formation and in an unconfined aquifer in alluvium closely associated with the San Juan River.

One water well was found to be located within one mile of the proposed site. The depth to water was reported to be approximately 28 feet in 1975. The water bearing unit was reported to be the Nacimiento Formation (Stone and others, 1983).

Figure 5 shows the location and specific conductance of wells in the Nacimiento/Animas formations in the San Juan Basin. The specific conductance of a well in this aquifer, located within five miles of the proposed site, is 8300 umhos/cm. Transmissivities for the Nacimiento Formation are estimated to be as high as 100 square feet per day for the coarser and more continuous sandstones (Stone and others, 1983).

Shallow groundwater present in the alluvial valley of the San Juan River is approximately two miles downgradient, southwest, from the proposed site. The specific conductance measured in wells in this aquifer within five miles of the proposed site, is between approximately 600 and 200 umhos/cm (see Figure 6). Transmissivities range from less than 1000 square feet per day to more than 40,000 square feet per day (Stone and others, 1983).

The saline and very saline groundwater is primarily used for stock, irrigation, and domestic purposes in the Bloomfield area.

References

Stone, W.J., Lyford, F.P., Frenzel, P.F., Mizell, N.H., Padgett, E.T., 1983, Hydrology and Water Resources of San Juan Basin, New Mexico Bureau of Mines and Mineral Resources, Hydrologic Report 6.

Flood Protection: Surface water runoff from the area surrounding the site will be diverted around the facility into the natural drainage path.

XI. FACILITY CLOSURE PLAN

All reasonable and necessary measures will be taken to prevent the exceedance of WCQQ Section 3103 quality standards should WFS choose to permanently close the Snowshoe Straddle Compressor Station. WFS will submit a detailed closure plan to the NMOCD prior to closure.

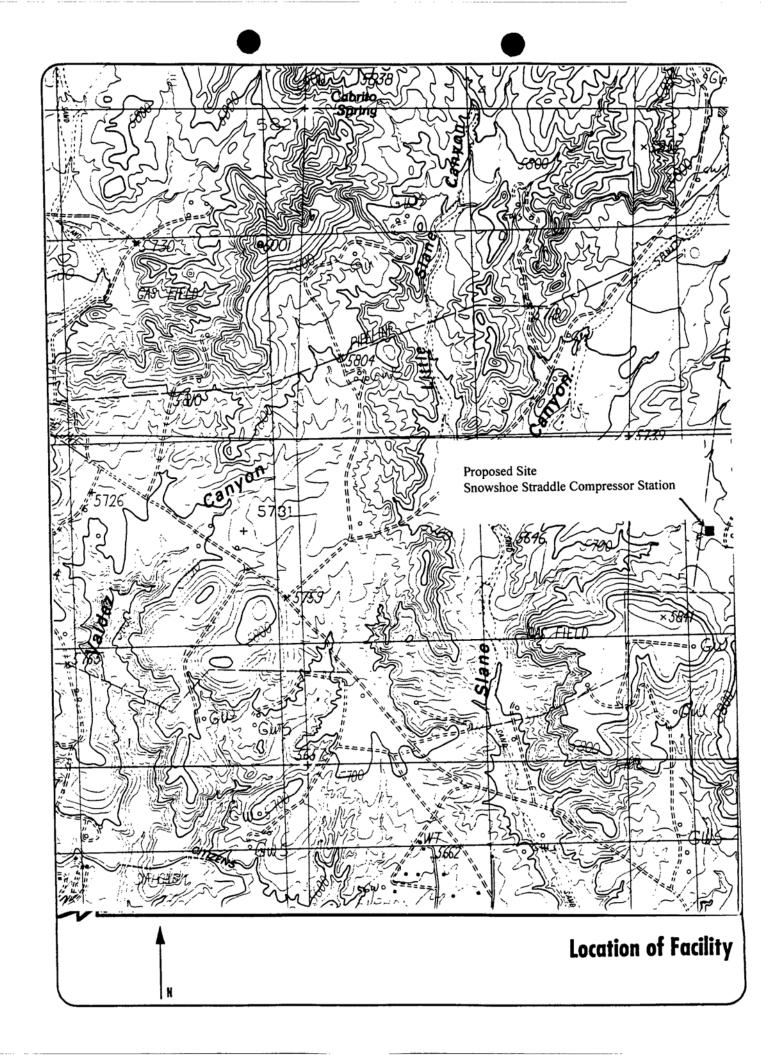
Generally, closure measures will include removal or closure in place of all underground piping

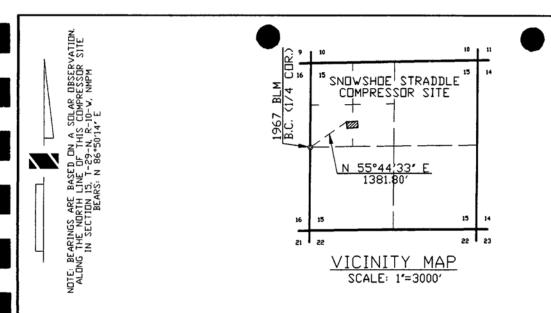
and other equipment. All wastes will be removed from the site and properly disposed in accordance with the rules and regulations in place at the time of closure. When all fluids, contaminants, and equipment have been removed from the site, the site will be graded as close to the original contour as possible.

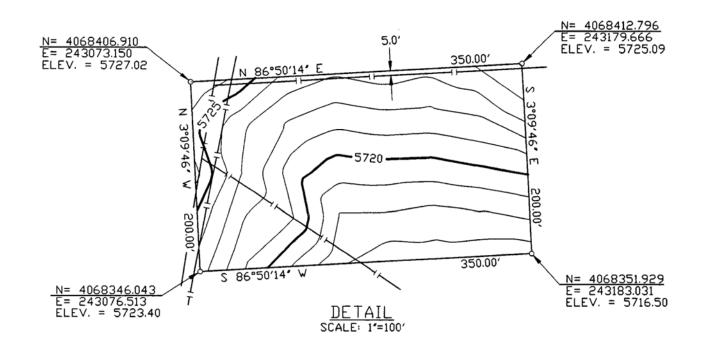
Should contaminated soil be discovered, any necessary reporting under NMOCD Rule 116 and WQCC Section 1203 will be made and clean-up activities will commence. Post-closure maintenance and monitoring plans would not be necessary unless contamination is encountered.

FIGURE 1

SITE LOCATION MAP







NOTES

1. TBM IS NAIL AT THE NW CORNER
OF THIS COMPRESSOR SITE
ELEV. = 5727.02'

2. ALL COORDINATES AS SHOWN ARE
DERIVED FROM U.S.G.S. QUAD MAP.
UTM COORDINATES, ZONE 13, IN METERS.

3. TOTAL AREA OF THIS SITE = 70,000.00 SQ.FT.
OR 1.607 ACRES.

4. O DENOTES SET 1/2" REBAR
W/CAP STAMPED L.S. #6707

SNOWSHOE STRADDLE COMPRESSOR SITE

					WILLI	AMS GAS PRO	CESSING - BLA	
					SNOWSHOE SEC. 1	ALTA GATI STRADDLE 5, T-29-N UAN COUNT	COMPRES, R-10-W,	SOR SITE NMPM
1	2/10/97	PB	ISSUED FOR REVIEW		DRAWN BY: PB	DATE: 2/10/97	CHKD BY: FA	APPR:
ND	DATE	BY	RE√ISION	APP	SCALE: "NOTED"	₩.0. NO.:	DWG ND: 79	9.9-X-12

F1413 (5/95)

T:\MAPPING\799\09\000004E1.DWG

FIGURE 2 SITE SURVEY PLAN

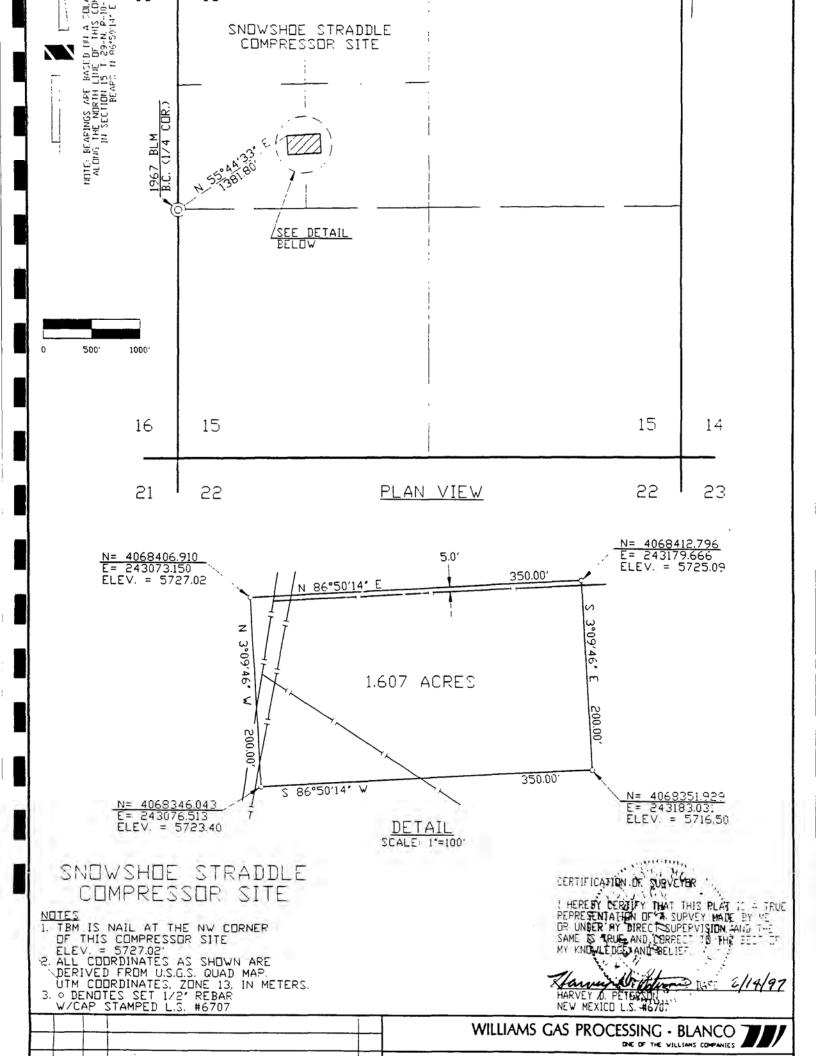
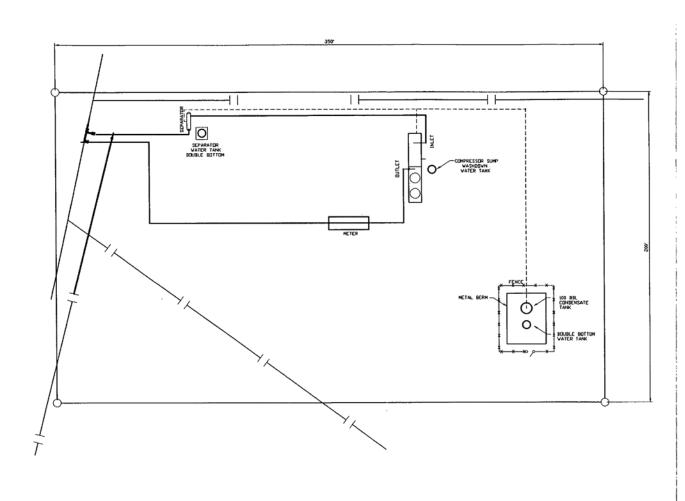


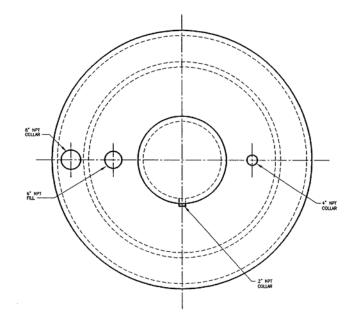
FIGURE 3

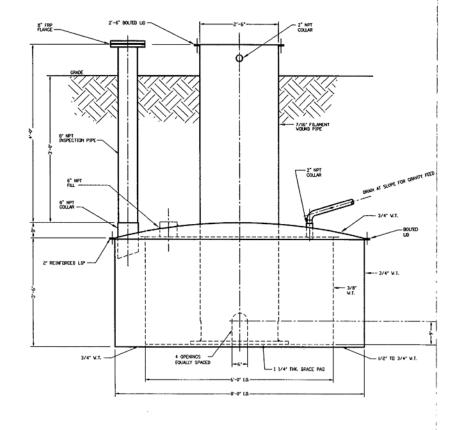
FACILITY PLOT PLAN



								H					DIOTING	BY D	ATE	WILLIAMS FIELD SERVICES of of the Values converts
													CHECKED APPROVED	#	二	TORRE ALTA GATHERING SYSTEM
				MO. DATE		DESCRIPTION	VANG OK	+	DATE 6	BY DESCRIPTION	Vous c	\mp	ENGINERING	BY D.	ATE	SNOWSHOE STRADDLE COMPRESSOR SITE SEC. 15, T-29-N, R-10-W, NMPM SSAN JUAN COUNTY, NEW MEXICO
LECEND	BRAVING N	RENCE DRAWINGS	nic.	HEL EMIL	REVISIONS						PRO_ CHK. APP. PRO_ APPROVED					20. NO. 0VIS NO. 0/19/97 XX

FIGURE 4 BELOW-GRADE TANKS

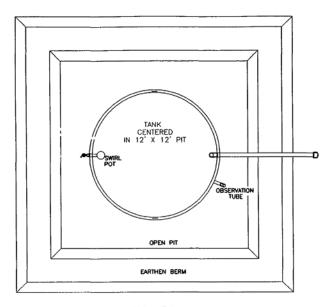




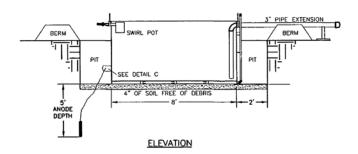
WASTE WATER SUMP

WASTE WATER SUMP ELEVATION

DRAFTING BY DATE WILLIAMS GAS PROCESSING OF SECURIOR FOR	DEGEND LEGEND	REFERENCE DRAWINGS					REVISIONS												VD. NO.	DWC NO.	STD-D-1-	4042
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DRAVI S.J. 8/28/77 DRECKED RR ORICKED RR SANUVSHDE COMPRESSER STATION REVIEW PRESSER/CARDIN HOMERIANDS SANUVSHDE COMPRESSER STATION SENUM-NAGAU REVIEW PRESSER/CARDIN HOMERIANDS SANUVSH GATHERING SYSTEM											OL	3-17-95 RJ	ORACHATZ HOTZYZ DRINGHTAD BL		RR MH	ENGINEERII	KC BY	DATE	: 1			
98.0 F							\neg			\neg			W REVISED PER SPECIFICATION MODIFICATIONS		NH.		-	 	⊣ .	AUL MAS	N GATHERING SY:	STEM
98.0 F							_			$\overline{}$	\neg				1-1-	APPROVED			7	SNOVSHOE	COMPRESSOR ST	ATION
MAN'S F.J. 8/28/72 PK FIRE VILLING CONNECT.				1		1	\neg							1	++-		RR					
be 8 nd values convert										\neg	\neg					BRAUN	KJ8	6/28/9				
DRAFTING BY DATE WILLIAMS GAS PROCESSING							_	1			-			-							■ 0	THE VILLIAMS COMMICE A
NAME OF THE PROPERTY OF THE PR										\neg						DRAFTING	BY	DATE			MITTINWS CV2	INCOCESSING
							_	T		$\neg \neg$	$\overline{}$			$\overline{}$	$\overline{}$			T			MARIALIAN CAC	DD CCCCIL IC T



TOP VIEW



\exists				-			+							DRAFTING	BY	DATE	WILLIAMS FIELD SERVICES
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_						 - 	+-+		+	-		 	_	PPROVEN	-		5' X 10' DOUBLE BOTTOM TANK INSTALLATION TORRE ALTA AREA
-				1		1	$\overline{}$						\Box				TANK INSTALLATION
														NONEERING	BY	DAIL	TURKE ALTA AREA
		DRAVING NO.	TITLE	BRAVING NO.	TITLE	NO. DATE	E BY	DESCRIPTION	O Dec.	APP. NO.	DATE B	BY DESCRIPTION VANO. CHK.	A50.	MANUALED TON	$\overline{}$		TOWN OF THE TOWN
-	LECEND	REFERENCE DRAWINGS							_ R	EVISIO	45	_				VO. NO. STD-0016B	
_																	

FIGURE 5

LOCATION AND SPECIFIC CONDUCTANCE WELLS IN NACIMIENTO/ANIMAS FORMATIONS

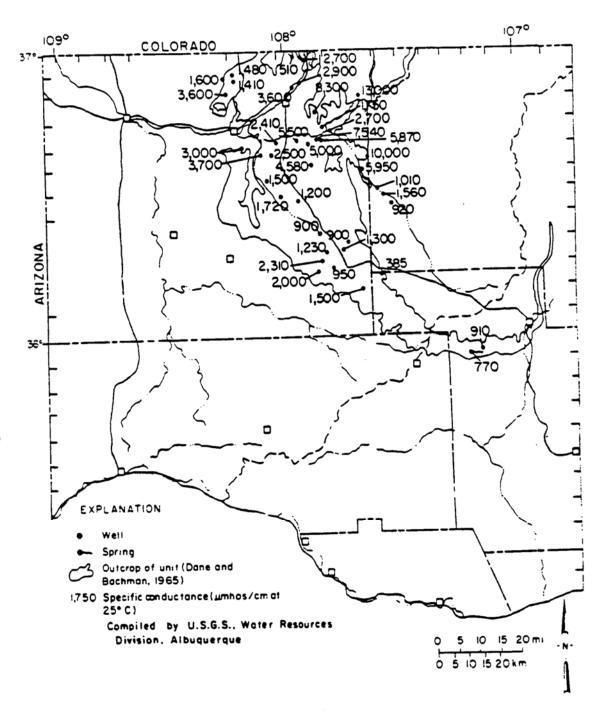
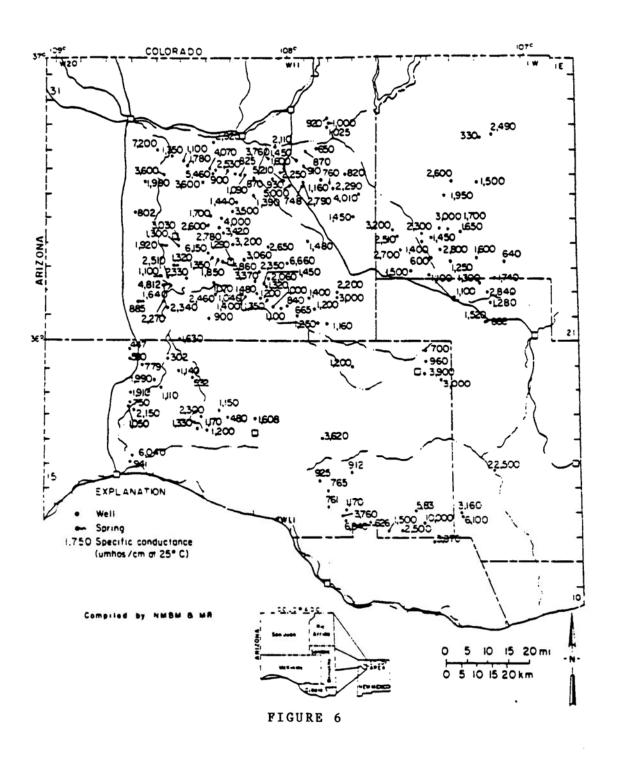


FIGURE 5

Specific Conductance from Selected Wells and Springs in Nacimiento/Animas Formations (Stone & Others, 1983)

FIGURE 6

LOCATION AND SPECIFIC CONDUCTANCE WELLS AND SPRINGS IN VALLEY FILL DEPOSITS



Specific Conductance from Selected Wells and Springs in Valley Fill Deposits (Stone and Others, 1983)

Α

APPENDIX A WASTE ANALYSIS

ANALYTICAL RESULTS

FOR

NORTHWEST PIPELINE CORPORATION
ENSECO-RMAL NO. 024601

SEPTEMBER 21, 1992

Enseco Incorporated

CEDAR HILL C.D.P. WASTE CILT WASTEWATER



ANALYTICAL RESULTS

FOR



NORTHWEST PIPELINE CORPORATION

ENSECO-RMAL NO. 024601

SEPTEMBER 21, 1992

Reviewed by:

Joe A. Maes

∌oel E. Holtz

Enseco Incorporated 4955 Yarrow Street Arvada, Colorado 80002 303/421-6611 Fax: 303/431-7171



ORGANIC ANALYSIS REPORT

Client: Williams Field Services AMERICAN Date Sampled: July 19,1995
WEST Date Received: July 20,1995

ANALYTICAL

LABORATORIES Analysis Requested:
Volatile Aromatics Total Purgeable Hydrocarbons

> Field Sample ID: SAN JUAN AREA CEDAR HILL #1

Contact: Mark Harvey Date Analyzed: July 26,1995

Method Ref.Number: SW-846 #8260 (Purge & Trap GC/MS)

Lab Sample ID: 123218-8

463 West 3600 South	Analytical Results		BTX/TPH-P
Salt Lake City, Utah 84115	Units = mg/L(ppm)		
	Compound:	Detection Limit:	Amount Detected:
	Benzene	0.020	0.036
(801) 263-8686 Fax (801) 263-8687	Toluene	0.020	0.046
	Ethylbenzene	0.020	0.14
	Total Xylene	0.020	0.95
	Total Purgeable Hydrocarbons	0.20	19.

Report Date: July 31,1995

1 of 1

< Value = None detected above the specified detection limit, or a value that reflects a reasonable limit due to interferences.



WEST ANALYTICAL **LABORATORIES**

INORGANIC ANALYSIS REPORT

Client Williams Field Service Date Sampled: July 19, 1995

Lab Sample ID.: 23218-08 Field Sample ID: San Juan Area/Cedar Hill #1

Contact: Mark Harvey Date Received: July 20, 1995 Received By: Laurie Hastings Set Description: One Water and

Seven Soil Samples

Analytical Results

	2001, 01011 2100 210	Wathard	K-4V	
63 West 3600 South Salt Lake City, Utah	TOTAL METALS	Method Used:	Detection Limit: mg/L	Amount Detected: mg/L
84115	Arsenic	7060	0.005	<0.005
	Barimm	6010	0.002	2.8
(801) 263-8686	Cadmium	6010	0.004	0.013
Fax (801) 263-8687	Chromium.	6010	0.01	0.03
	Lead	6010	0.05	0.13
	Mercury	747 1	0.001	<0.001
	Selenium	7740	0.005	<0.005
	Silver	6010	0.01	<0.01
	OTHER CHEMISTRIES			
	pН	150.1	0.1	6.8
	TDS	160.1	1.0	3,600.
	TOX	9020	0.5	1.6

Released by:

Laboratory Supervisor



Introduction

This report presents the analytical results as well as supporting information to aid in the evaluation and interpretation of the data and is arranged in the following order:

- o Sample Description Information
- o Analytical Test Requests
- o Analytical Results
- o Quality Control Report

All analyses at Enseco are performed so that the maximum concentration of sample consistent with the method is analyzed. Dilutions are at times required to avoid saturation of the detector, to achieve linearity for a specific target compound, or to reduce matrix interferences. In this event, reporting limits are adjusted proportionately. Surrogate compounds may not be measurable in samples which have been diluted.

Sample 024601-0001 was diluted for Method 8020 due to concentrations of target compounds present beyond linear range; the reporting limits have been increased accordingly.

Sample 024601-0002 was diluted for Method 9020 due to matrix interferences; the reporting limits have been increased accordingly.

Sample Description Information

The Sample Description Information lists all of the samples received in this project together with the internal laboratory identification number assigned for each sample. Each project received at Enseco-RMAL is assigned a unique six digit number. Samples within the project are numbered sequentially. The laboratory identification number is a combination of the six digit project code and the sample sequence number.

Also given in the Sample Description Information is the Sample Type (matrix), Date of Sampling (if known) and Date of Receipt at the laboratory.



Analytical Test Requests

The Analytical Test Requests lists the analyses that were performed on each sample. The Custom Test column indicates where tests have been modified to conform to the specific requirements of this project.



SAMPLE DESCRIPTION INFORMATION for Northwest Pipeline Corporation

Lab ID	Client ID	Matrix	Sampled Date Time	Received Date
024601-0001-SA 024601-0002-SA 024601-0003-TB	CEDAR HILL CDP WASTE WATER TAN WASTE OIL TANK CEDAR HILL TRIP BLANK	AQUEOUS AQUEOUS AQUEOUS	18 AUG 92 12:40 18 AUG 92 11:30	



ANALYTICAL TEST REQUESTS for Northwest Pipeline Corporation

Lab ID: 024601	Group Code	Analysis Description	Custom Test?
0001	A	pH Total Dissolved Solids (TDS) ICP Metals (Total) Prep - Total Metals, ICP Total Organic Halogen (TOX) Benzene, Toluene, Ethyl Benzene and Xylenes (BTEX)	N N Y N N
		Arsenic, Furnace AA (Total) Prep - Total Metals, Furnace AA Lead, Furnace AA (Total) Mercury, Cold Vapor AA (Total) Prep - Mercury, Cold Vapor AA (Total)	N N N N
0002	В	Arsenic, Furnace AA Prep - Total Metals, Furnace AA ICP Suite Prep - Total Metals, ICP Lead, Furnace AA Total Organic Halogen (TOX) Ignitability, Closed Cup	N N N N N
0003	С	Benzene, Toluene, Ethyl Benzene and Xylenes (BTEX)	N



Analytical Results

The analytical results for this project are presented in the following data tables. Each data table includes sample identification information, and when available and appropriate, dates sampled, received, authorized, prepared and analyzed. The authorization data is the date when the project was defined by the client such that laboratory work could begin.

Data sheets contain a listing of the parameters measured in each test, the analytical results and the Enseco reporting limit. Reporting limits are adjusted to reflect dilution of the sample, when appropriate. Solid and waste samples are reported on an "as received" basis, i.e. no correction is made for moisture content.

The results from the Standard Enseco QA/QC Program, which generates data which are independent of matrix effects, are provided subsequently.



Benzene, Toluene, Ethyl Benzene and Xylenes (BTEX)

Method 8020

Client Name: Northwest Pipeline Corporation
Client ID: CEDAR HILL CDP WASTE WATER TANK
Lab ID: 024601-0001-SA
Matrix: AQUEOUS Sampled: 18
Authorized: 19 AUG 92 Prepared: NA Received: 19 AUG 92 Analyzed: 22 AUG 92 Sampled: 18 AUG 92 Prepared: NA

Parameter	Result	Units	Reporting Limit
Benzene Toluene Ethylbenzene Xylenes (total)	19 63 12 240	ug/L ug/L ug/L ug/L	1.2 1.2 1.2 1.2
Surrogate	Recovery		
a,a,a-Trifluorotoluene	112	%	

ND = Not detected NA = Not applicable

Reported By: Steve Shurgot

Approved By: Stan Dunlavy



Benzene, Toluene, Ethyl Benzene and Xylenes (BTEX)

Method 8020

Client Name: Northwest Pipeline Corporation
Client ID: TRIP BLANK
Lab ID: 024601-0003-TB
Matrix: AQUEOUS Sampled: Ur
Authorized: 19 AUG 92 Prepared: NA Sampled: Unknown Prepared: NA Received: 19 AUG 92 Analyzed: 24 AUG 92

Parameter	Result	Units	Reporting Limit
Benzene Toluene Ethylbenzene Xylenes (total)	ND ND ND ND	ug/L ug/L ug/L ug/L	0.50 0.50 0.50 0.50
Surrogate	Recovery		
a,a,a-Trifluorotoluene	106	%	

ND = Not detected NA = Not applicable

Reported By: Steve Shurgot

Approved By: Stan Dunlavy





Total Metals

Client Name: Northwest Pipeline Corporation
Client ID: CEDAR HILL CDP WASTE WATER TANK
Lab ID: 024601-0001-SA
Matrix: AQUEOUS Sampled: 18
Authorized: 19 AUG 92 Prepared: See Received: 19 AUG 92 Analyzed: See Below Sampled: 18 AUG 92 Prepared: See Below

Parameter	Result	Units	Reporting Limit	Analytical Method	Prepared Date	Analyzed Date
Arsenic Barium Cadmium Chromium Lead Mercury	ND 0.11 ND 0.15 0.020 ND	mg/L mg/L mg/L mg/L mg/L mg/L	0.0050 0.010 0.0050 0.010 0.010 0.00020	7060 6010 6010 6010 7421 7470	10 SEP 92 10 SEP 92 10 SEP 92 10 SEP 92	12 SEP 92 15 SEP 92 15 SEP 92 B 15 SEP 92 11 SEP 92 13 SEP 92

Note B : Compound is also detected in the blank.

ND = Not detected NA = Not applicable

Reported By: Jeff Malecha

Approved By: Sandra Jones





Total Metals

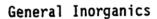
Client Name: Northwest Pipeline Corporation
Client ID: WASTE OIL TANK CEDAR HILL
Lab ID: 024601-0002-SA
Matrix: WASTE Sampled: 18
Authorized: 19 AUG 92 Prepared: Se Received: 19 AUG 92 Analyzed: See Below Sampled: 18 AUG 92 Prepared: See Below

Parameter	Result	Units	Reporting Limit	Analytical Method	Prepared Date	Analyzed Date
Arsenic Cadmium Chromium Lead	ND ND 1.0 2.8	mg/kg mg/kg mg/kg mg/kg	1.0 0.50 1.0 2.2	7060 6010 6010 7421	14 SEP 92 14 SEP 92	16 SEP 92 15 SEP 92 15 SEP 92 14 SEP 92

ND = Not detected NA = Not applicable

Reported By: Bob Reilly

Approved By: Sandra Jones





Client Name: Northwest Pipeline Corporation
Client ID: CEDAR HILL CDP WASTE WATER TANK
Lab ID: 024601-0001-SA
Matrix: AQUEOUS Sampled: 18
Authorized: 19 AUG 92 Prepared: See Sampled: 18 AUG 92 Prepared: See Below Received: 19 AUG 92 Analyzed: See Below

Parameter	Result	Units	Reporting Limit	Analytical Method	Prepared Date	Analyzed Date
pH Total Organic	4.9	units		9040	NA	19 AUG 92
Halogen as Cl	71.4	ug/L	30.0	9020	NA	10 SEP 92
Total Dissolved Solids	498	mg/L	10.0	160.1	NA	25 AUG 92

ND = Not detected NA = Not applicable

Reported By: Pam Rosas

Approved By: Steve Shurgot

General Inorganics



Client Name: Northwest Pipeline Corporation
Client ID: WASTE OIL TANK CEDAR HILL
Lab ID: 024601-0002-SA
Matrix: WASTE Sampled: 18 Matrix: WASTE Authorized: 19 AUG 92 Sampled: 18 AUG 92 Prepared: See Below Received: 19 AUG 92 Analyzed: See Below

Parameter	Result	Units	Reporting Limit	Analytical Method	Prepared Date	Analyzed Date
Ignitability	>160	deg. F		1010	NA	03 SEP 92 o
Total Organic Halogen as Cl	ND	mg/kg	3.0	9020	NA	15 SEP 92

Note o : This test is unreliable for any sample other than a non-aqueous liquid.

ND = Not detected NA = Not applicable

Reported By: Leslie Gergurich Approved By: Steve Shurgot



Quality Control Report

The Enseco laboratories operate under a vigorous QA/QC program designed to ensure the generation of scientifically valid, legally defensible data by monitoring every aspect of laboratory operations. Routine QA/QC procedures include the use of approved methodologies, independent verification of analytical standards, use of Duplicate Control Samples to assess the precision and accuracy of the methodology on a routine basis, and a rigorous system of data review.

In addition, the Enseco laboratories maintain a comprehensive set of certifications from both state and federal governmental agencies which require frequent analyses of blind audit samples. Enseco-Rocky Mountain Analytical Laboratory is certified by the EPA under the EPA/CLP program for Organic analyses, under the USATHAMA (U.S. Army) program, by the Army Corps of Engineers, and the states of Colorado, New Jersey, Utah, and Florida, among others.

The standard laboratory QC package is designed to:

- establish a strong, cost-effective QC program that ensures the generation of scientifically valid, legally defensible data
- 2) assess the laboratory's performance of the analytical method using control limits generated with a well-defined matrix
- 3) establish clear-cut guidelines for acceptability of analytical data so that QC decisions can be made immediately at the bench, and
- 4) provide a standard set of reportables which assures the client of the quality of his data.



The Enseco QC program is based upon monitoring the precision and accuracy of an analytical method by analyzing a set of Duplicate Control Samples (DCS) at frequent, well-defined intervals. Each DCS is a well-characterized matrix which is spiked with target compounds at 5-100 times the reporting limit, depending upon the methodology being monitored. The purpose of the DCS is not to duplicate the sample matrix, but rather to provide an interference-free, homogeneous matrix from which to gather data to establish control limits. These limits are used to determine whether data generated by the laboratory on any given day is in control.

Control limits for accuracy (percent recovery) are based on the average, historical percent recovery +/- 3 standard deviation units. Control limits for precision (relative percent difference) range from 0 (identical duplicate DCS results) to the average, historical relative percent difference + 3 standard deviation units. These control limits are fairly narrow based on the consistency of the matrix being monitored and are updated on a quarterly basis.

For each batch of samples analyzed, an additional control measure is taken in the form of a Single Control Sample (SCS). The SCS consists of a control matrix that is spiked with either representative target compounds or surrogate compounds appropriate to the method being used. An SCS is prepared for each sample lot for which the DCS pair are not analyzed.

Accuracy for DCS and SCS is measured by Percent Recovery.

Precision for DCS is measured by Relative Percent Difference (RPD).



All samples analyzed concurrently by the same test are assigned the same QC lot number. Projects which contain numerous samples, analyzed over several days, may have multiple QC lot numbers associated with each test. The QC information which follows includes a listing of the QC lot numbers associated with each of the samples reported, DCS and SCS (where applicable) recoveries from the QC lots associated with the samples, and control limits for these lots. The QC data is reported by test code, in the order that the tests are reported in the analytical results section of this report.



QC LOT ASSIGNMENT REPORT Organics by Chromatography

 Laboratory Sample Number
 QC Matrix
 QC Category
 QC Lot Number (DCS)
 QC Run Number (SCS/BLANK)

 024601-0001-SA 024601-0003-TB
 AQUEOUS AQUEOUS
 602-A 602-A
 18 AUG 92-1H 18 AUG 92-1H
 22 AUG 92-1H 24 AUG 92-1H



DUPLICATE CONTROL SAMPLE REPORT Organics by Chromatography

Analyte	Concentration Spiked Measured				Accuracy Average(%)		Precision (RPD)	
	•	DCS1	DCS2	AVG	DCS	Limits	DČS Li	
Category: 602-A Matrix: AQUEOUS QC Lot: 18 AUG 92-1H Concentration Units: ug/L								
Benzene Toluene Ethylbenzene Xylenes (total) 1,3-Dichlorobenzene	5.0 5.0 5.0 5.0	5.28 4.99 4.85 4.82 4.83	5.29 5.01 4.89 4.88 4.94	5.28 5.00 4.87 4.85 4.88	106 100 97 97 98	72-112 74-109 76-105 74-111 72-121	0.2 0.4 0.8 1.2 2.3	10 10 10 10 15



SINGLE CONTROL SAMPLE REPORT Organics by Chromatography

Accuracy(%)
SCS Limits Concentration Spiked Measured Analyte Category: 602-A
Matrix: AQUEOUS
QC Lot: 18 AUG 92-1H QC Run: 22 AUG 92-1H Concentration Units: ug/L 30.0 31.2 104 90-113 a,a,a-Trifluorotoluene Category: 602-A Matrix: AQUEOUS QC Lot: 18 AUG 92-1H QC Run: 24 AUG 92-1H Concentration Units: ug/L 30.9 103 90-113 30.0 a,a,a-Trifluorotoluene



METHOD BLANK REPORT Organics by Chromatography

Analyte	Result	Units	Reporting Limit
Test: 8020-BTEX-AP Matrix: AQUEOUS QC Lot: 18 AUG 92-1H QC Rur	: 22 AUG 92-1H		
Benzene Toluene Ethylbenzene Xylenes (total)	ND ND ND ND	ug/L ug/L ug/L ug/L	0.50 0.50 0.50 0.50
Test: 8020-BTEX-AP Matrix: AQUEOUS QC Lot: 18 AUG 92-1H QC Rur	: 24 AUG 92-1H		
Benzene Toluene Ethylbenzene Xylenes (total)	ND ND ND ND	ug/L ug/L ug/L ug/L	0.50 0.50 0.50 0.50



QC LOT ASSIGNMENT REPORT Metals Analysis and Preparation

Laboratory Sample Number	QC Matrix	QC Category	QC Lot Number (DCS)	QC Run Number (SCS/BLANK)
024601-0001-SA 024601-0001-SA 024601-0001-SA 024601-0001-SA 024601-0002-SA 024601-0002-SA	AQUEOUS AQUEOUS AQUEOUS AQUEOUS SOIL SOIL SOIL	ICP-AT AS-FAA-AT PB-FAA-AT HG-CVAA-AT AS-FAA-S ICP-S PB-FAA-S	10 SEP 92-1A 10 SEP 92-1A 10 SEP 92-1A 13 SEP 92-1A 11 SEP 92-1A 14 SEP 92-1R 14 SEP 92-1R	10 SEP 92-1A 10 SEP 92-1A 10 SEP 92-1A 13 SEP 92-1A 11 SEP 92-1A 14 SEP 92-1R 14 SEP 92-1R



DUPLICATE CONTROL SAMPLE REPORT Metals Analysis and Preparation

Analyte	Cor Spiked	ncentratio DCS1	n Measured DCS2	AVG		uracy age(%) Limits	Precis (RPD) DCS L)
Category: ICP-AT Matrix: AQUEOUS QC Lot: 10 SEP 92-1A Concentration Units: mg/L								
Aluminum Antimony Arsenic Barium Beryllium Cadmium Calcium Chromium Cobalt Copper Iron Lead Magnesium Manganese Nickel Potassium Silver Sodium Vanadium Zinc	2.0 0.5 0.05 0.05 0.05 0.25 0.25 0.5 0.5 0.05 0.0	2.03 0.510 0.480 1.92 0.0500 0.0468 103 0.190 0.471 0.281 1.01 0.472 51.1 0.489 0.483 52.5 0.0488 110 0.495 0.496	2.04 0.499 0.453 1.93 0.0497 0.0442 102 0.195 0.467 0.269 1.00 0.475 50.6 0.477 0.478 51.9 0.0477 109 0.489	2.03 0.505 0.467 1.92 0.0498 0.0455 103 0.192 0.469 0.275 1.01 0.473 50.8 0.483 0.480 52.2 0.0483 109 0.496 0.492	102 101 93 96 100 91 103 96 94 110 101 95 102 97 96 104 97 109 98	75-125 75-125 75-125 75-125 75-125 75-125 75-125 75-125 75-125 75-125 75-125 75-125 75-125 75-125 75-125 75-125 75-125 75-125 75-125 75-125	0.2 2.7 0.6 5.7 0.6 9 4.0 7 1.0 2.5 1.1 2.6 0.4 1.6	20 20 20 20 20 20 20 20 20 20 20 20 20 2
Category: AS-FAA-AT Matrix: AQUEOUS QC Lot: 10 SEP 92-1A Concentration Units: mg/L								
Arsenic	0.03	0.0329	0.0348	0.0338	113	75-125	5.6	20
Category: PB-FAA-AT Matrix: AQUEOUS QC Lot: 10 SEP 92-1A Concentration Units: mg/L								
Lead	0.03	0.0349	0.0313	0.0331	110	75-125	11	20



DUPLICATE CONTROL SAMPLE REPORT Metals Analysis and Preparation (cont.)

Analyte	Co Spiked	ncentratio DCS1	on Measure DCS2	ed ? AVG	Accur Avera AVG DCS		Precis (RPD) DCS Li	
Category: HG-CVAA-AT Matrix: AQUEOUS QC Lot: 13 SEP 92-1A Concentration Units: mg/L								
Mercury	0.0010	0.000967	0.00100	0.000983	98	75-125	3.4	20
Category: AS-FAA-S Matrix: SOIL QC Lot: 11 SEP 92-1A Concentration Units: mg/kg								
Arsenic	145	102	104	103	71	59-141	1.0	20
Category: ICP-S Matrix: SOIL QC Lot: 14 SEP 92-1R Concentration Units: mg/kg								
Aluminum Antimony Arsenic Barium Beryllium Cadmium Calcium Chromium Cobalt Copper Iron Lead Magnesium Manganese Molybdenum Nickel Potassium Silver Sodium Vanadium Zinc	10700 55.2 145 503 129 154 7390 151 122 162 15400 148 3740 423 159 166 4050 104 747 154 530	6840 54.8 128 435 118 140 6600 127 110 156 12400 129 3250 376 145 154 3530 98.2 717 135 478	7480 57.4 135 459 124 147 6960 136 116 13400 139 3480 397 152 162 3770 106 766 142 504	7160 56.1 131 447 121 144 6780 132 113 161 12900 134 3360 387 148 158 3650 102 741 138 491	67 102 91 89 94 93 92 87 93 99 90 91 93 99 99	47-153 18-362 59-141 76-124 53-131 68-132 79-121 66-133 70-130 70-132 66-135 74-126 74-125 71-129 67-133 68-132 76-124 57-130 73-127	8.695964944290511166623 54.6555767555676555	20 20 20 20 20 20 20 20 20 20 20 20 20 2



DUPLICATE CONTROL SAMPLE REPORT Metals Analysis and Preparation (cont.)

Accuracy Average(%) DCS Limits Precision (RPD) DCS Limit Concentration Measured Analyte Spiked DCS1 DCS2 AVG DCS

Category: PB-FAA-S Matrix: SOIL QC Lot: 14 SEP 92-1R

Concentration Units: mg/kg

20 140 93 50-150 11 150 132 148 Lead

METHOD BLANK REPORT Metals Analysis and Preparation

Analyte	Result	Units	Reporting Limit
Test: ICP-AT Matrix: AQUEOUS QC Lot: 10 SEP 92-1A QC Ru Barium Cadmium Chromium	n: 10 SEP 92-1A ND 0.0099 ND	mg/L mg/L mg/L	0.010 0.0050 0.010
Test: AS-FAA-AT Matrix: AQUEOUS QC Lot: 10 SEP 92-1A QC Ru Arsenic	n: 10 SEP 92-1A ND	mg/L	0.0050
Test: PB-FAA-AT Matrix: AQUEOUS QC Lot: 10 SEP 92-1A QC Ru Lead	n: 10 SEP 92-1A ND	mg/L	0.0050
Test: HG-CVAA-AT Matrix: AQUEOUS QC Lot: 13 SEP 92-1A QC Ru Mercury	n: 13 SEP 92-1A ND	mg/L	0.00020
Test: AS-FAA-W Matrix: WASTE QC Lot: 11 SEP 92-1A QC Ru Arsenic	in: 11 SEP 92-1A ND	mg/kg	0.50
Test: ICP-W Matrix: WASTE QC Lot: 14 SEP 92-1R QC Ru Cadmium Chromium	un: 14 SEP 92-1R ND ND	mg/kg mg/kg	0.50 1.0



METHOD BLANK REPORT Metals Analysis and Preparation (cont.)

Reporting Limit Result Units Analyte

Test: PB-FAA-W Matrix: WASTE QC Lot: 14 SEP 92-1R QC Run: 14 SEP 92-1R

ND mg/kg Lead 0.50



QC LOT ASSIGNMENT REPORT Wet Chemistry Analysis and Preparation

Laboratory Sample Number	QC Matrix	QC Category	QC Lot Number (DCS)	QC Run Number (SCS/BLANK)		
024601-0001-SA	AQUEOUS	PH-A	19 AUG 92-1G	25 AUG 92-1A		
024601-0001-SA	AQUEOUS	TDS-A	25 AUG 92-1A			
024601-0001-SA	AQUEOUS	TOX-A	10 SEP 92-1A			
024601-0002-SA	SÕIL	TOX-S	15 SEP 92-1A			



DUPLICATE CONTROL SAMPLE REPORT Wet Chemistry Analysis and Preparation

Annlyto	Cond Spiked	centratio	n Measured			uracy age(%)	Precis (RPD)	
Analyte	Spiked	DCS1	DCS2	AVG	DCS	Limits	DČS L	
Category: PH-A Matrix: AQUEOUS QC Lot: 19 AUG 92-1G Concentration Units: units								
РH	9.1	9.04	9.05	9.04	99	98-102	0.1	5
Category: TDS-A Matrix: AQUEOUS QC Lot: 25 AUG 92-1A Concentration Units: mg/L								
Total Dissolved Solids	1170	1150	1130	1140	97	90-110	1.8	10
Category: TOX-A Matrix: AQUEOUS QC Lot: 10 SEP 92-1A Concentration Units: ug C1/L								
Total Organic Halogen as Cl	100	90.0	90.6	90.3	90	80-120	0.7	20
Category: TOX-S Matrix: SOIL QC Lot: 15 SEP 92-1A Concentration Units: mg/kg								
Total Organic Halogen as Cl	1.0	0.955	1.05	1.00	100	75-125	9.5	20



METHOD BLANK REPORT Wet Chemistry Analysis and Preparation

Reporting Limit Units Result Analyte

Test: TDS-BAL-A Matrix: AQUEOUS QC Lot: 25 AUG 92-1A QC Run: 25 AUG 92-1A

Total Dissolved Solids 10.0 mg/L ND

Appendix



Rocky Mountain Analytical Laboratory 4955 Yarrow Street Arvada, CO 80002 303/421-6611 FAX: 303/431-7171

CHAIN OF CUSTODY	CAMPIN CATALOG CONTRACTOR CONTRAC									
	SAMPLE SAFE TM CONDITIONS									
NSECO CLIENT	PACKED BY SEAL NUMBER									
ROJECT	SEAL INTACT UPON RECEIPT BY SAMPLING COMPANY CONDITION OF CONTENTS									
AMPLING COMPANY	SEALED FOR SHIPPING BY	NITIAL CONTENTS TEMP.								
AMPLING SITE	SEAL NUMBER SAMPLING STATUS	<u> </u>								
AIN LINE OF THE PROPERTY OF TH	☐ Done ☐ Continuir	ng Until								
TEAM LEADER	2 1 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	PERATURE UPON RECEIPT BY LAB								
	☐ Yes ☐ No	JM °C								
	MPLE TYPE # CONTAINERS ANALYSIS PARAMETERS	REMARKS								
18-92 12:49 CEDIAR HILL COP WHIER THUIL AG	VECUS 1 PH / TOS									
11 2/6	2010									
18-97 17:50 AC	Surcus / PH / TOS	<u> </u>								
-18-92 12:45 11 11 pre	TALS 4T METALS	10 16								
, 410	RUID	/1/2								
· 18-92 17:47 " " " " " " " " " " " " " " " " " " "	ETALS 4T METALS	(0)								
18-9217:40 " " 410	QUID 15 TOX SINGLE	201								
11 .	QUID 15 TOX SINGLE) 02								
	1 1 4	<i></i>								
18-92 11:30 WASTE OIL TANK OFDAR HILL USE	D C12									
ا با اسم م	FD 014	02								
-18-9211:50 WASTE OIL TANK CEDAR HILL US										
	TO THE RESIDENCE OF THE PROPERTY OF THE PROPER									
-18 92 12:00 WASTE OIL TANK CEDAR HILL US	FD 016									
CUSTODY TRANSFERS PRIOR TO SHIPPING	SHIPPING DETAILS									
RELINQUISHED BY (SIGNED) RECEIVED BY (SIGNED) DATE TIME	DELIVERED TO SHIPPER BY									
RELINQUISHED BY (SIGNED) RECEIVED BY (SIGNED) DATE TIME		AIRBILL NUMBER								
frank Colfffy Irank Lellig 8/18/92 2:0										
The thought of the same of the	RECEIVED FOR LAB	DATE/TIME O 84								
	ENSECO PROJECT NUMBER	8/19/92								
	24/001									
ENS~1133 White - CUE!										



Rocky Mountain Analytical Laboratory 4955 Yarrow Street Arvada, CO 80002 303/421-6611 FAX: 303/431-7171

CHAIN C	CHAIN OF CUSTODY							SAMPLE SAFE ^{IM} CONDITIONS								
ENSECO CLIENT							PACKED BY SEAL NUMBER									
PROJECT							SEAL INTAC	CONDITION OF CONTENTS								
SAMPLING COMP	ANY						SEALED FOR	SHIPPING BY			INITIAL CONTENTS TEMP.					
SAMPLING SITE							SEAL NUMBER SAMPLING STATUS Done Continuing Until									
TEAM LEADER							SEAL INTAC	T UPON RECEIPT	BY LAB.	CONTENTS TEN	MPERATURE UPON RECEIPT BY LA	°C				
DATE	TIME	T	SAMPLE ID/DE	SCRIPTION				# CONTAINERS	ANALYSIS PARA	AMETERS	REMARKS					
		CEDIAR	HILL COP	WASTE W	HIFR	AGUL	005	11	VOA							
8-18-43	12:53	11	HILL COP		//	AGUE AGUE LIQU	005	11	WA		>01					
	17:55				//	AQU	FOUS	11	NOA		/					
												,				
		CUSTODY TRA	NSFERS PRIOR TO	SHIPPING					SHIP	PING DETAILS						
RELINQUISHED BY (SIGNED) RECEIVED BY (SIGNED) DATE TIME				TIME		TO SHIPPER BY										
							METHOD OF				AIRBILL NUMBER					
							RECEIVED	NAC	SIGNED	noncery	DATE/TIME	0845				
							ENSECO PR	2460	1 ./)	-/	, ,					
ENS-1133					White	- CLIENT	Pink -	LAB								

В

APPENDIX B
SPILL CONTROL PROCEDURES



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в.

DISCHARGES OR SPILLS OF OIL OR HAZARDOUS SUBSTANCES; Preventing, Controlling and Reporting of

A. PURPOSE AND SCOPE

- A.1 To establish the policy and procedure for preventing, controlling, and reporting of spills or discharges of oil or hazardous substances to the environment in accordance with Company practices and federal, state, and local requirements, including Title 40 of the Code of Federal Regulations - Part 112 (Oil Pollution Prevention).
- A.2 This document pertains to Company personnel and Company and non-company facilities. The spill prevention and control requirements in this Policy and Procedure are Federally mandated guidelines for oil pollution prevention. The Company policy is to also apply these standards, where appropriate, to facilities containing hazardous substances. This is a discretionary application of the standards; however, variations from the standards should be approved by the responsible Director.

CONTENTS

C. POLICY

- C.1 General
- C.2 Bulk Storage Tanks
- C.3 Facility Drainage
- C.4 Transfer Operations, Pumping, and In-Plant/Station Process
- C.5 Facility Tank Car and Tank Truck Loading/Unloading Rack

D. PROCEDURE

- D.1 Identifying, Containing and Initial Reporting of a Discharge or Spill of a Hazardous or Toxic Substance
- D.2 Submitting Written Notification of a Discharge or Spill

ATTACHMENT A: Discharge or Spill Containment Procedures and Materials

C. POLICY

C.1 GENERAL

- C.1.1 All Company facilities which could discharge or spill oil or hazardous substances which may affect natural resources or present an imminent and substantial danger to the public health or welfare including, but not limited to fish, shellfish, wildlife, shorelines, and beaches are subject to the provisions of this document.
- C.1.2 Hazardous Substance, for purposes of this procedure, is defined as any chemical or material that has or should have a Material Safety Data Sheet (MSDS); however, hazardous substances are further defined by the following environmental statutes:
 - a. Section 101 (N) and Section 102 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)
 - b. Section 307(a) and Section 311 (b)(2)(A) of the Clean Water Act
 - c. Section 3001 of the Solid Waste Act (excluding items suspended by Congress)
 - d. Section 112 of the Clean Air Act
 - e. Section 7 of the Toxic Substance Control Act

Supersedes Policy and Procedure 12.10.020 dated July 7, 1989.

Approval(Page 1 only)

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- C.1.3 The term hazardous substance does not include petroleum, including crude oil or any fraction thereof, which is not otherwise specifically listed or designated as a hazardous substance in the first sentence of this paragraph, and the term does not include natural gas, natural gas liquids, liquefied natural gas or synthetic gas usable for fuel (or mixtures of natural gas and such synthetic gas).
- C.1.4 Oil, for the purpose of this document, means oil of any kind or in any form, including but not limited to petroleum, fuel oil, Y grade, mixed products, sludge, oil refuse, and oil mixed with wastes other than dredged spoil (earth and rock). LPG (propane, butane, ethane) are not considered to be oil.
- C.1.5 Facilities which could discharge or spill oil or hazardous substances into a watercourse must comply with the required federal, state, or local laws and regulations. A discharge includes but is not limited to any spilling, leaking, pumping, pouring, emitting, emptying, or dumping. A watercourse is any perennial or intermittent river, stream, gully, wash, lake, or standing body of water capable of collecting or transporting an oil or hazardous substance.
- C.1.6 Facilities which are subject to the requirements stated in this policy are as follows:
 - Non-Transportation Related Facilities
 - (1) Storage or drip tanks and other aboveground containers (excluding pressurized or inline process vessels) having a capacity in excess of 660 gallons for each single container or an aggregate capacity of 1,321 gallons or more for multiple containers.
 - (2) Underground storage facilities having a total capacity in excess of 42,000 gallons.
 - b. Transportation Related Facilities
 - (1) All vehicles, pipeline facilities, loading/unloading facilities, and other mobile facilities which transport oil or hazardous substances.
- C.1.7 Each Company location which has facilities subject to paragraph C.1.1 shall have a site specific Spill Prevention Control and Countermeasure Plan (SPCC Plan) which identifies all facilities subject to 40 CFR 112. The plan shall identify all hazardous substance storage vessels at the facility and the spill prevention measures in place to control discharges or spills. This plan shall also identify all regulatory agencys that must be notified in case of a spill.
- C.1.8 The facility supervisor is responsible for spill prevention. His/her duties include, but are not limited to, the following:
 - a. Instructing personnel in the operation and maintenance of equipment to prevent the discharge of oil.
 - b. Conduct briefings for operating personnel at intervals frequent enough to assure adequate understanding of the Spill Plan at that facility.
 - c. Briefings should highlight and describe known discharges or spills, and recently developed precautionary measures.
- C.1.9 Each individual facility is checked by the supervisor or designee to determine the potential for discharges or spills of oil or hazardous substances in harmful quantities that violate water quality standards or which may cause a film, sheen, or discoloration on the surface of water. All facilities which have the potential for discharging or spilling harmful quantities of oil or hazardous substances into a watercourse are required to have the following preventive measures:
 - a. Examination of all tanks, valves and fittings, at least annually, to determine any maintenance requirements.

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- b. All tank batteries should, as far as practicable, have a secondary means of containment for the entire contents of the largest single tank plus sufficient freeboard in the containment facility to allow for precipitation.
- c. A annual monitoring and inspection program to prevent accidental spills or discharges into watercourses. This includes annual inspection for faulty systems and monitoring line valves and liquid pipelines for leaks or blowouts.
- C.1.10 Any field drainage ditches, road ditches, traps, sumps, or skimmers should be inspected at annual scheduled intervals for accumulation of liquid hydrocarbons or other hazardous substances which may have escaped from small leaks. Any such accumulations should be removed.

C.2 BULK STORAGE TANKS

- C.2.1 A tank should not be used for storage of oil or hazardous substances unless the material and construction of the tank is compatible with the material stored and conditions of storage such as pressure and temperature. Buried storage tanks must be protected from corrosion by coatings, cathodic protection, or other methods compatible with local soil conditions. Aboveground tanks should be subject to visual inspection for system integrity.
- C.2.2 The facility supervisor should evaluate level monitoring requirements to prevent tank overflow.
- C.2.3 Leaks which result in loss of oil or hazardous substances from tank seams, gaskets, rivets and bolts sufficiently large to cause accumulation of oil or hazardous substances in diked areas should be promptly corrected.
- C.2.4 Mobile or portable oil or hazardous substances storage tanks should be positioned or located to prevent the contents from reaching a watercourse. The mobile facilities should be located so their support structure will not be undermined by periodic flooding or washout.

C.3 FACILITY DRAINAGE

- C.3.1 Make provisions for drainage from diked storage areas where necessary in areas with high precipitation levels. Drainage from dike areas should be restrained by valves or other means to prevent a discharge or spill. Diked areas should be emptied by pumps or ejectors which are manually activated. Valves used for the drainage of diked areas should be of manual, open-and-closed design.
- C.3.2 Rain water may be drained from diked areas providing drainage water does not contain oil or hazardous substances that may cause a harmful discharge. Drain valves must be closed following drainage of diked areas.
- C.3.3 When possible, drainage systems from undiked areas should flow into ponds, lagoons, or catchment basins designed to retain oil or hazardous substances or return the substances to the facility. Any drainage system which is not designed to allow flow into ponds, lagoons, or catchment basins should be equipped with a diversion system that could, in the event of a discharge or spill, contain the oil or hazardous substances on the Site.
- C.3.4 The principal means of containing discharges or spills is the use of dikes which are constructed wherever regulated quantities of oil or hazardous substances have the potential of reaching a watercourse. The construction of dikes must meet the following requirements:
 - a. Capacity must be at least equivalent to the storage capacity of the largest tank of the battery plus sufficient freeboard to allow for pecipitation, or displacement by foreign materials.
 - b. Small dikes for temporary containment are constructed at valves where potential leaking of oil or hazardous substances may occur.



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- c. Any dike three feet or higher should have a minimum cross section of two feet at the top.
- C.3.5 Other means of containment or spill control include, but are not limited to:
 - a. Berms or retaining walls:
 - b. Curbing;
 - c. Culverting, gutters, or other drainage systems;
 - d. Weirs, booms, or other barriers;
 - Spill diversion ponds or retention ponds;
 - f. Sorbent materials

C.4 TRANSFER OPERATIONS, PUMPING, AND IN-PLANT/STATION PROCESS

- C.4.1 Aboveground valves and pipelines should be examined annually by operating personnel to determine whether there are any leaks from flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, valve locks, and metal surfaces.
- C.5 FACILITY TANK CAR AND TANK TRUCK LOADING/UNLOADING RACK
- C.5.1 Rack area drainage which does not flow into a catchment basin or treatment facility designed to handle spills should have a quick drainage system for use in tank truck loading and unloading areas. The containment system should have a maximum capacity of any single compartment of a truck loaded or unloaded in the station.
- C.5.2 Aboveground piping that has potential for damage by vehicles entering the Site should be protected by logically placed warning signs or by concrete-filled pipe barriers.
- C.5.3 Loading and unloading areas should be provided with an interlocked warning light, grounding shutdown, physical barrier system, or warning signs to prevent vehicular departure before complete disconnect of flexible or fixed transfer lines. All drains and outlets of any truck should be closely examined for leakage prior to filling and departure. All drains and outlets which may allow leakage should be tightened, adjusted, or replaced to prevent liquid leakage while in transit.

NOTE: LPG loading facilities and remote field loading of condensate are exempt from the C.5 requirements of this document.

D. PROCEDURE

D.1 IDENTIFYING, CONTAINING AND INITIAL REPORTING OF A DISCHARGE OR SPILL OF OIL OR HAZARDOUS SUBSTANCE

Any Employee

D.1.1 Upon noticing a discharge or spill of an oil or hazardous substance in any quantity initiates immediate containment procedures and notifies facility supervisor.

NOTE: Refer to Attachment A for containment procedures.

Facility Supervisor

- D.1.2 Contacts Gas Control and responsible Director <u>immediately</u> by telephone and provides the following information:
 - Name of company facility and/or location of facility and nature of discharge or spill
 - b. Description and quantity of emission or substance discharged
 - c. Name, title, and telephone number of person initially reporting the discharge or spill and person reporting to Gas Control
 - d. Action taken or being taken to mitigate and correct discharge or spill
 - e. Water bodies or streams involved
 - f. Time and duration of discharge or spill
 - g. Outside involvement during discharge or spill (public government agencies, etc. See Emergency Operating Procedure Manuals)

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Gas Control Personnel

D.1.3 Advises Environmental Services departments <u>immediately</u> by telephone concerning the incident including any incidents reported by persons not employed with the Company.

NOTE: If Gas Control is contacted by a person not employed with the Company, the necessary information is obtained as indicated in D.1.2 and the Supervisor and Environmental Services are immediately contacted to begin containment and clean-up of the discharge or spill.

D.1.4 If Environmental Services cannot be contacted, notifies Director over Environmental Services.

Facility Supervisor

- D.1.5 Coordinates containment and clean-up of discharge or spill, keeping the responsible Director Informed.
- D.1.6 If the discharge or spill is too large for Company personnel to contain, contacts qualified local contractors for assistance. (See Emergency Operating Procedure Manuals tab #11, contractors with available equipment and services).
- D.1.7 Advises Environmental Services by telephone if emergency containment or clean-up assistance from a state agency or a response team from the U.S. Coast Guard is required.

Environmental Services

- D.1.8 Contacts Legal Department (and Right-of-Way Department, if appropriate) and assesses reporting requirements to state and federal agencies. (See Emergency Operating Procedure Manuals).
- D.1.9 Makes appropriate contacts with U.S. Coast Guard and state agencies when necessary.
- D.1.10 If spill is significant, dispatches Environmental Specialist to scene to oversee cleanup and reporting responsibilities.
- D.2 SUBMITTING WRITTEN NOTIFICATION OF A DISCHARGE OR SPILL

Facility Supervisor

- D.2.1 Completes a written description of the incident as soon as possible after initial notification is given, which should include the following:
 - . Time and date of discharge or spill
 - b. Facility name and location
 - c. Type of material spilled
 - d. Quantity of material spilled
 - e. Area affected
 - f. Cause of spill
 - g. Special circumstances
 - h. Corrective measures taken
 - Description of repairs made
 Preventative measures taken to prevent recurrence.
- D.2.2 Forwards the completed report to Environmental Services and a copy to Legal Department.
 Retains a copy for future reference.

NOTE: Environmental Services, in coordination with the Legal Department, submits written reports to government agencies.



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ATTACHMENT A

Discharge or Spill Containment Procedures and Materials

Ty Di	pe of Facility where the scharge or Spill occurs	or Spill occurs Containment Procedures			
λ.	Oil Pipeline (as defined in C.1.4)	2.	Closes appropriate block valves. Contains discharge or spill by: ditching covering, applying sorbents, constructing an earthen dam, or burning. If burning is required, obtains approval from the appropriate state air quality control government agencies before burning.	2. 3. 4. 5. 6.	Straw Loose Barth Oil Sorbent - 3M Brand Plain Wood Chips Sorb - Oil Chips Banta Co. Sorb - Oil Swabs Banta Co. Sorb - Oil Mats Banta Co. Or Equivalent Materials.
в.	Vehicle		Contains discharge or spill by: ditching, covering surface with dirt, constructing earthen dams, applying sorbents, or burning Notifies immediately the Compliance and Safety Department and if there is any imminent danger to local residents; notifie immediately the highway patrol or local police officials.		
		3.	If burning is required, obtains approval from the appropriate state air quality control government agencies before burning. NOTE: Any vehicle carrying any hazardous or toxic substance will carry a show or other ditching device to contain spill. If the vehicle has sufficient room, sorbent materials should also carried.	rel a nt	
с.	Bulk Storage Tanks or any other Facilities		Contains discharge or spill by: ditching, covering, applying sorbents, constructing an earthen dam, or burning. If burning is required, obtains approval from the appropriate state air quality control government agencies before burning.	•	

С

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APPENDIX C

NMOCD NOTIFICATION OF FIRE, BREAKS, SPILLS, LEAKS, AND BLOWOUTS

District I - (505) 393-6161
P. O. Box 1940
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 South First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

State of New Mexico Energy Minerals and Natural Resources Department

Oil Conservation Division 2040 South Pacheco Street

Santa Fe, New Mexico 87505 (505) 827-7131 Form C- 141 Originated 2/13/97

Submit 2 copies to Appropriate District Office in accordance with Rule 116

				Release	Notification OPE	and Co		tive Action		Initia	al Report	Г	Fine	l Report
Name							Contac	t .						
Address							Telephone No.							
Facility Nam	ie			-		Facility Type								
Surface Own	ner				Mineral Owner					Lease	No.			
					LOCATION	OF RE	LEAS	E						
Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet fro	om the	East/West Line	Count	у				
	<u> </u>	<u> </u>			NATURE O	F REL	EASE							
Type of Relea	isc						Volume	of Release		W	olume Recov	ered		
Source of Rei	ease						Date an	nd Hour of Occurren	nœ	Date	e and Hour	of Di	iscovery	
Was Immedia	ate Notice	Given?	Yes	No	Not Required		If YES,	To Whom?						
By Whom?						Date and Hour								
Was a Wate	rcourse Rea	iched?] Yes [No			If YES, Volume Impacting the Watercourse.							
If a Waterco	urse was In	npacted, Descri	be Fully.*											
Describe Ca	use of Prob	lem and Remed	ial Action T	aken.*										
Describe An	Describe Area Affected and Cleanup Action Taken.*													
Describe Ge	neral Cond	itions Prevailing	g (Temperati	are, Precipitation	, etc.).*									
I hereby certify that the information given above is true and complete to the best of my knowledge and belief. Signature:						OIL CONSERVATION DIVISION								
Printed Name: Ap							Approved by District Supervisor:							
Title:							proval Date: Expiration Date:							
Date:				Phone:		Conditi	ions of A	Approval:			Attached	<u> [</u>		
* Attach A	Additional	Sheets If Nec	essary											

EXHIBIT A

116 RELEASE NOTIFICATION AND CORRECTIVE ACTION

116.A. NOTIFICATION

- (1) The Division shall be notified of any unauthorized release occurring during the drilling, producing, storing, disposing, injecting, transporting, servicing or processing of crude oil, natural gases, produced water, condensate or oil field waste including regulated NORM, or other oil field related chemicals, contaminants or mixture thereof, in the State of New Mexico in accordance with the requirements of this Rule. [1-1-50... - 97.]
- (2) The Division shall be notified in accordance with this Rule with respect to any release from any facility of oil or other water contaminant, in such quantity as may with reasonable probability be detrimental to water or cause an exceedance of the standards in 19 NMAC 15.A.19. B(1), B(2) or B(3). [-97.]
- 116.B. REPORTING REQUIREMENTS: Notification of the above releases shall be made by the person operating or controlling either the release or the location of the release in accordance with the following requirements:
- (1) A Major Release shall be reported by giving both immediate verbal notice and timely written notice pursuant to Paragraphs C(1) and C(2) of this Rule. A Major Release is:
 - (a) an unauthorized release of a volume, excluding natural gases, in excess of 25 barrels;
 - (b) an authorized release of any volume which:
 - (I) results in a fire;
 - (ii) will reach a water course;
 - (iii) may with reasonable probability endanger public health; or
 - (iv) results in substantial damage to property or the environment;
 - (c) an unauthorized release of natural gases in excess of 500 mcf; or
 - (d) a release of any volume which may with reasonable probability be detrimental to water or cause an exceedance of the standards in 19 NMAC 15.A.19. B(1), B(2) or B(3). [-97.]
- (2) A Minor Release shall be reported by giving timely written notice pursuant to Paragraph C(2) of this Rule. A Minor Release is an unauthorized release of a volume, greater than 5 barrels but not more than 25 barrels; or greater than 50 mcf but less than 500 mcf of natural gases. [--97]

116.C. CONTENTS OF NOTIFICATION:

- (1) Immediate verbal notification required pursuant to Paragraph B shall be reported within twenty-four (24) hours of discovery to the Division District Office for the area within which the release takes place. In addition, immediate verbal notification pursuant to Subparagraph B.(1).(d). shall be reported to the Division's Environmental Bureau Chief. This notification shall provide the information required on Division Form C-141. [5-22-73... -97.]
- (2) Timely written notification is required to be reported pursuant to Paragraph B within fifteen (15) days to the Division District Office for the area within which the release takes place by completing and filing Division Form C-141. In addition, timely written notification required pursuant to Subparagraph B.(1).(d), shall also be reported to the Division's Environmental Bureau Chief within fifteen (15) days after the release is discovered. The written notification shall verify the prior verbal notification and provide any appropriate additions or corrections to the information contained in the prior verbal notification. [5-22-73... -97.]
- 116.D. CORRECTIVE ACTION: The responsible person must complete Division approved corrective action for releases which endanger public health or the environment. Releases will be addressed in accordance with a remediation plan submitted to and approved by the Division or with an abatement plan submitted in accordance with Rule 19 (19 NMAC 15.A.19). [-97.].

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- B. Plans, specifications and reports required by this Section, if related to facilities for the production, refinement and pipeline transmission of oil and gas, or products thereof, shall be filed instead with the Oil Conservation Division. [1-4-68, 12-1-95]
- C. Plans and specifications required to be filed under this Section must be filed prior to the commencement of construction. [9-3-72]

1203. NOTIFICATION OF DISCHARGE--REMOVAL.

- A. With respect to any discharge from any facility of oil or other water contaminant, in such quantity as may with reasonable probability injure or be detrimental to human health, animal or plant life, or property, or unreasonably interfere with the public welfare or the use of property, the following notifications and corrective actions are required: [2-17-74, 12-24-87]
- 1. As soon as possible after learning of such a discharge, but in no event more than twenty-four (24) hours thereafter, any person in charge of the facility shall orally notify the Chief of the Ground Water Protection and Remediation Bureau of the department, or his counterpart in any constituent agency delegated responsibility for enforcement of these rules as to any facility subject to such delegation. To the best of that person's knowledge, the following items of information shall be provided:
- a. the name, address, and telephone number of the person or persons in charge of the facility, as well as of the owner and/or operator of the facility;
 - b. the name and address of the facility;
- c. the date, time, location, and duration of the discharge;
 - d. the source and cause of discharge;
- e. a description of the discharge, including its chemical composition;
 - f. the estimated volume of the discharge; and
- g. any actions taken to mitigate immediate damage from the discharge.
 [2-17-74, 2-20-81, 12-24-87, 12-1-95]
 - 2. When in doubt as to which agency to notify, the

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person in charge of the facility shall notify the Chief of the Ground Water Protection and Remediation Bureau of the department. If that department does not have authority pursuant to commission delegation, the department shall notify the appropriate constituent agency. [12-24-87, 12-1-95]

- 3. Within one week after the discharger has learned of the discharge, the facility owner and/or operator shall send written notification to the same department official, verifying the prior oral notification as to each of the foregoing items and providing any appropriate additions or corrections to the information contained in the prior oral notification. [12-24-87]
- 4. The oral and written notification and reporting requirements contained in this Subsection A are not intended to be duplicative of discharge notification and reporting requirements promulgated by the Oil Conservation Commission (OCC) or by the Oil Conservation Division (OCD); therefore, any facility which is subject to OCC or OCD discharge notification and reporting requirements need not additionally comply with the notification and reporting requirements herein. [2-17-74, 12-24-87]
- 5. As soon as possible after learning of such a discharge, the owner/operator of the facility shall take such corrective actions as are necessary or appropriate to contain and remove or mitigate the damage caused by the discharge. [2-17-74, 12-24-87]
- delaying needed corrective actions, the facility owner/operator shall endeavor to contact and consult with the Chief of the Ground Water Protection and Remediation Bureau of the department or appropriate counterpart in a delegated agency, in an effort to determine the department's views as to what further corrective actions may be necessary or appropriate to the discharge in question. In any event, no later than fifteen (15) days after the discharger learns of the discharge, the facility owner/operator shall send to said Bureau Chief a written report describing any corrective actions taken and/or to be taken relative to the discharge. Upon a written request and for good cause shown, the Bureau Chief may extend the time limit beyond fifteen (15) days. [12-24-87, 12-1-95]
- 7. The Bureau Chief shall approve or disapprove in writing the foregoing corrective action report within thirty (30) days of its receipt by the department. In the event that the report is not satisfactory to the department, the Bureau Chief shall specify in writing to the facility owner/operator any shortcomings in the report or in the corrective actions already taken or proposed to be taken relative to the discharge, and shall give the facility owner/operator a reasonable and clearly specified

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time within which to submit a modified corrective action report. The Bureau Chief shall approve or disapprove in writing the modified corrective action report within fifteen (15) days of its receipt by the department. [12-24-87]

- 8. In the event that the modified corrective action report also is unsatisfactory to the department, the facility owner/operator has five (5) days from the notification by the Bureau Chief that it is unsatisfactory to appeal to the department secretary. The department secretary shall approve or disapprove the modified corrective action report within five (5) days of receipt of the appeal from the Bureau Chief's decision. In the absence of either corrective action consistent with the approved corrective action report or with the decision of the secretary concerning the shortcomings of the modified corrective action report, the department may take whatever enforcement or legal action it deems necessary or appropriate. [12-24-87, 12-1-95]
- 9. If the secretary determines that the discharge causes or may with reasonable probability cause water pollution in excess of the standards and requirements of Section 4103 of this Part, and the water pollution will not be abated within one hundred and eighty (180) days after notice is required to be given pursuant to Section 1203.A.1 of this Part, the secretary may notify the facility owner/operator that he is a responsible person and that an abatement plan may be required pursuant to Sections 4104 and 4106.A of this Part. [12-1-95]
- B. Exempt from the requirements of this Section are continuous or periodic discharges which are made: [2-17-74]
- 1. in conformance with regulations of the commission and rules, regulations or orders of other state or federal agencies; or [2-17-74]
- 2. in violation of regulations of the commission, but pursuant to an assurance of discontinuance or schedule of compliance approved by the commission or one of its duly authorized constituent agencies. [2-17-74]
- C. As used in this Section and in Sections 4100 through 4115, but not in other Sections of this Part: [2-17-74, 12-1-95]
- 1. "discharge" means spilling, leaking, pumping, pouring, emitting, emptying, or dumping into water or in a location and manner where there is a reasonable probability that the discharged substance will reach surface or subsurface water; [2-17-74]
- 2. "facility" means any structure, installation, operation, storage tank, transmission line, motor vehicle, rolling 20 NMAC 6.2

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stock, or activity of any kind, whether stationary or mobile; [2-17-74]

- 3. "oil" means oil of any kind or in any form including petroleum, fuel oil, sludge, oil refuse and oil mixed with wastes; [2-17-74]
- 4. "operator" means the person or persons responsible for the overall operations of a facility; and [12-24-87]
- 5. "owner" means the person or persons who own a facility, or part of a facility. [12-24-87]
- D. Notification of discharge received pursuant to this Part or information obtained by the exploitation of such notification shall not be used against any such person in any criminal case, except for perjury or for giving a false statement.

 [2-17-74]
- E. Any person who has any information relating to any discharge from any facility of oil or other water contaminant, in such quantity as may with reasonable probability injure or be detrimental to human health, animal or plant life, or property, or unreasonably interfere with the public welfare or the use of property, is urged to notify the Chief of the Ground Water Protection and Remediation Bureau of the department. Upon such notification, the secretary may require an owner/operator or responsible person to perform corrective actions pursuant to Sections 1203.A.5 or 1203.A.9 of this Part. [12-1-95]

[1204-1209] Reserved

1210. VARIANCE PETITIONS.

- A. Any person seeking a variance pursuant to Section 74-6-4 (G) NMSA 1978, shall do so by filing a written petition with the commission. The petitioner may submit with his petition any relevant documents or material which the petitioner believes would support his petition. Petitions shall: [7-19-68, 11-27-70, 9-3-72]
- 1. state the petitioner's name and address; [7-19-68, 11-27-70]
 - state the date of the petition; [7-19-68]
- 3. describe the facility or activity for which the variance is sought; [7-19-68, 11-27-70]
- 4. state the address or description of the property upon which the facility is located; [11-27-70]